

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

KRISTINA GERSZTEN,

Civil Action No. 08-1280

Plaintiff,

v.

Judge Arthur J. Schwab

UNIVERSITY OF PITTSBURGH
CANCER INSTITUTE CANCER CENTERS,

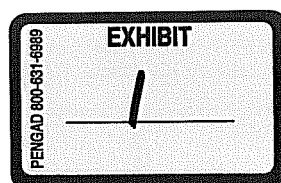
Defendant.

JURY TRIAL DEMANDED

AFFIDAVIT OF COLLEEN RAMAGE JOHNSTON

I, Colleen Ramage Johnston, do hereby affirm:

1. I am an attorney admitted to the practice of law in Pennsylvania and before the United States District Court for the Western District of Pennsylvania, the United States Court of Appeals for The Third Circuit and the United States Supreme Court. I am employed by the firm of Rothman Gordon, P.C.
2. I was lead counsel in the case of Gerszten v. University of Pittsburgh Cancer Institute Cancer Centers, Civil Action No. 08-1280.
3. I am a 1991 graduate of the Duquesne University School of Law. I have been employed by Rothman Gordon, P.C. since October 2005. My practice concentrates exclusively in the area of employment law. I have served as lead counsel at trial in both federal and state courts.
4. I am a Fellow in the Academy of Trial Lawyers and am a past Member of its Board of Governors. I am also a member of the Allegheny County Bar Association and serve as Vice Chair of the Labor and Employment Section. In addition, I am a member of the national and local chapters of the National Employment Lawyers



Association (NELA); the American Bar Association and the Pennsylvania Bar Association.

5. The firm's current billing rate for work performed by me is \$350.00 per hour. This is the current rate charged for similar work performed for hourly rate clients.

6. The attached schedule of work undertaken and costs incurred in relation to this action is a true and accurate summary prepared by me from my contemporaneous time and expense records.

7. I am aware of the skill, reputation and experience of Cami L. Davis, Esquire, and Chuck J. Vrscak, Jr., Paralegal.

8. Based on my knowledge of their skill, reputation and experience, it is my opinion that Ms. Davis' requested rate of \$180 per hour and Mr. Vrscak's requested rate of \$115 per hour are eminently reasonable, and certainly within the prevailing hourly rate for attorneys and paralegals of their caliber in the Western District of Pennsylvania.

9. It also is my opinion that the rates requested are comparable to the rates charged by attorneys and paralegals with their skill, experience and reputation in other equally complex areas of the law.

I state under penalty of perjury that the foregoing is true and accurate to the best of my knowledge.


Colleen Ramage Johnston

SWORN TO AND SUBSCRIBED
BEFORE ME THIS 7th DAY
OF DECEMBER, 2009.


Notary Public

ND: 4813-5080-5765, v. 1 | 60065-002

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Lauren J. Tomlinson, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires Oct. 24, 2013

Member, Pennsylvania Association of Notaries

Rothman Gordon P.C.
ATTORNEYS AT LAW
 310 GRANT STREET-THIRD FLOOR
PITTSBURGH, PA 15219
(412) 338-1100 - Fax (412) 281-7304

KRISTINA GERSZTEN, M.D.
 5400 DARLINGTON ROAD
 PITTSBURGH, PA 15217

December 7, 2009

Client 60065
 Invoice# 119741 CRJ
 Billing through 12/07/2009

UPMC - CONTINGENT

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For Services Rendered

02/01/2007	CRJ	RECEIVE EMAIL FROM M. LALLY RE: NON-RENEWAL LETTER	0.20 hrs.	70.00
02/15/2007	CRJ	MEETING WITH CLIENT RE: FILING EEOC CHARGE	2.00 hrs.	700.00
03/02/2007	CRJ	PHONE CONFERENCE WITH CLIENT RE: STATUS AND STRATEGY	0.40 hrs.	140.00
03/17/2007	CRJ	RECEIVE EMAIL FROM M. LALLY RE: EEOC CLAIM	0.20 hrs.	70.00
03/19/2007	CRJ	REVIEW FILE AND DRAFT EEOC CHARGE AND AFFIDAVIT FOR CLIENT'S REVIEW	1.70 hrs.	595.00
04/02/2007	CRJ	RECEIVE AND REVIEW SIGNED EEOC DOCUMENTS FROM CLIENT; DRAFT LETTER TO EEOC ENCLOSING SAME FOR FILING	0.10 hrs.	35.00
05/29/2007	CRJ	PHONE CONFERENCE WITH CLIENT RE: SETTLEMENT DEMAND	0.50 hrs.	175.00
07/11/2007	CRJ	PHONE CONFERENCE WITH ED MCGINLEY RE: TERMS OF SETTLEMENT AND SEND EMAIL TO CLIENT RE: SAME	0.20 hrs.	70.00
07/12/2007	CRJ	PHONE CONFERENCE WITH CLIENT AND M. LALLY RE: CONVERSATION WITH E. MCGINLEY AND STATUS OF EEOC CASE	0.50 hrs.	175.00
09/17/2007	CRJ	DRAFT LETTER TO ED MCGINLEY RE: FOLLOW UP TO TELEPHONE CONVERSATION ON 07/11/07	0.20 hrs.	70.00
09/28/2007	CRJ	REVIEW FILE AND DRAFT FOLLOW-UP	0.20 hrs.	70.00

		CORRESPONDENCE RE: PROGRESS OF SETTLEMENT		
10/29/2007	CRJ	PHONE CONFERENCE WITH ED MCGINLEY RE: PROGRESS OF SETTLEMENT	0.20 hrs.	70.00
10/29/2007	CRJ	DRAFT LETTER TO CLIENT RE: PROGRESS OF SETTLEMENT PER DISCUSSION WITH ED MCGINLEY	0.20 hrs.	70.00
05/07/2008	CRJ	PHONE CONFERENCE WITH EEOC RE: PROPOSED SETTLEMENT	0.20 hrs.	70.00
05/19/2008	CRJ	SEND EMAIL TO CLIENT RE: STATUS	0.20 hrs.	70.00
05/20/2008	CRJ	PHONE CONFERENCE WITH EEOC (FRANK RODEA) RE: STATUS	0.20 hrs.	70.00
05/20/2008	CRJ	EXCHANGE EMAIL WITH CLIENT RE: STATUS AND REJECTION OF SETTLEMENT AGREEMENT	0.20 hrs.	70.00
05/29/2008	CRJ	SEND EMAIL TO F. RODIA (EEOC) CONTAINING CLIENTS 2 OPTIONS FOR SETTLEMENT AND REQUEST FOR FOLLOW-UP	0.20 hrs.	70.00
05/29/2008	CRJ	PHONE CONFERENCE WITH CLIENT RE: FEASIBILITY OF SETTLEMENT AND STATUS	0.30 hrs.	105.00
07/28/2008	CRJ	PHONE CONFERENCE WITH CLIENT AND M. LALLY RE: STATUS	0.30 hrs.	105.00
08/05/2008	CRJ	MEET WITH CLIENT TO DISCUSS POSITION STATEMENT, LITIGATION STRATEGY	1.50 hrs.	525.00
08/06/2008	CRJ	REVIEW FILE AND DRAFT COMPLAINT	1.00 hrs.	350.00
08/13/2008	NVL	REVIEW FILE AND REVISE COMPLAINT.	1.20 hrs.	210.00
08/15/2008	CRJ	REVIEW FINAL VERSION OF COMPLAINT; SEND EMAIL TO CLIENT WITH SAME ATTACHED FOR REVIEW	0.30 hrs.	105.00
08/18/2008	CRJ	REVIEW CLIENT'S CHANGES AND QUESTIONS REGARDING DRAFT COMPLAINT. REVISE FINAL DRAFT OF COMPLAINT	1.00 hrs.	350.00
09/09/2008	CRJ	RECEIVE EMAIL FROM M. LALLY RE: STATUS	0.20 hrs.	70.00
09/15/2008	CRJ	RECEIVE AND REVIEW COMPLAINT - Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Complaint 5	0.20 hrs.	70.00
09/15/2008	CRJ	DISCUSS FILING LAWSUIT WITH M. LALLY	0.20 hrs.	70.00
09/16/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v.	0.20 hrs.	70.00

Date	Case	Description	Hours	Amount
09/18/2008	CRJ	UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Notice of ADR Designation	0.20 hrs.	70.00
09/22/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Waiver of Service Executed	0.20 hrs.	70.00
09/23/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order	0.20 hrs.	70.00
09/24/2008	CJV	REVIEW CLIENT DOCUMENTS	4.50 hrs.	517.50
09/25/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Errata	0.20 hrs.	70.00
09/25/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Motion to Continue	0.20 hrs.	70.00
09/26/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order on Motion to Continue	0.20 hrs.	70.00
09/26/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Update Deadlines	0.20 hrs.	70.00
09/26/2008	CJV	REPRODUCE CLIENT DOCUMENTS TO BE PRODUCED, INDEX SAME	2.50 hrs.	287.50
09/29/2008	CRJ	MEET WITH CLIENT TO REVIEW CLIENT DOCUMENTS AND DISCUSS STATUS	2.50 hrs.	875.00
09/29/2008	CRJ	MEET WITH C. VRSCAK TO REVIEW CLIENT DOCUMENTS	0.50 hrs.	175.00
10/02/2008	CJV	REVIEW AND REPRODUCE ADDITIONAL CLIENT DOCUMENTS	3.80 hrs.	437.00
10/03/2008	CRJ	PHONE CONFERENCE WITH CLIENT RE: STATUS	0.30 hrs.	105.00
10/04/2008	CRJ	PHONE CONFERENCE WITH M. LALLY AND CLIENT	0.50 hrs.	175.00
10/21/2008	CRJ	DRAFT LETTER TO CLIENT REQUESTING DOCUMENTS	0.20 hrs.	70.00
10/21/2008	CRJ	DRAFT LETTER TO EEOC REQUESTING COPY OF FILE	0.20 hrs.	70.00
10/21/2008	CRJ	MEET WITH C. VRSCAK TO REVIEW	4.50 hrs.	1,575.00

		CLIENT DOCUMENTS		
10/21/2008	CRJ	DRAFT RULE 26(F) REPORT OF THE PARTIES	0.70 hrs.	245.00
10/21/2008	CRJ	PHONE CONFERENCE WITH MIRANDA NICKLES RE: RULE 26(F) REPORT, ADR MATTERS	0.40 hrs.	140.00
10/21/2008	CRJ	DRAFT PROPOSED CASE MANAGEMENT ORDER	0.70 hrs.	245.00
10/21/2008	CJV	REVIEW DOCUMENTS IN PREPARATION OF MEETING	0.60 hrs.	69.00
10/21/2008	CJV	MEET WITH CRJ RE: REVIEW CLIENT DOCUMENTS	4.50 hrs.	517.50
10/22/2008	CRJ	DRAFT LETTER TO EEOC REQUESTING COPY OF FILE	0.20 hrs.	70.00
10/22/2008	CRJ	DRAFT LETTER TO CLIENT REQUESTING INFORMATION	0.30 hrs.	105.00
10/22/2008	CJV	REPRODUCE AND CORRELATE CLIENT DOCUMENTS, REPRODUCE AND READ ADDITIONAL DOCUMENTS FORWARDED BY CLIENT	4.30 hrs.	494.50
10/28/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Proposed Case Management Order	0.20 hrs.	70.00
10/28/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Report of Rule 26(f) Planning Meeting	0.20 hrs.	70.00
10/29/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Stipulation Selecting ADR process	0.20 hrs.	70.00
10/29/2008	CRJ	RECEIVE AND RECVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Disclosure Statement	0.20 hrs.	70.00
10/29/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Answer to Complaint	0.20 hrs.	70.00
10/29/2008	CRJ	DRAFT LETTER TO CLIENT WITH COPY OF ANSWER TO COMPLAINT ENCLOSED	0.20 hrs.	70.00
10/30/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER	0.20 hrs.	70.00

		INSTITUTE Order		
10/31/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Stipulation Selecting ADR process	0.20 hrs.	70.00
11/03/2008	CRJ	PHONE CONFERENCE WITH M. LALLY RE: STATUS	0.50 hrs.	175.00
11/03/2008	CRJ	PHONE CONFERENCE WITH CLIENT RE: STATUS	0.40 hrs.	140.00
11/03/2008	CRJ	SEND EMAILS TO POTENTIAL MEDIATORS	0.30 hrs.	105.00
11/07/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Notice of Mediation	0.20 hrs.	70.00
11/07/2008	CRJ	DRAFT LETTER TO CLIENT RE: CONFIRMATION OF MEDIATION DATE AND DOCUMENTS FOR SIGNATURE	0.20 hrs.	70.00
11/12/2008	CRJ	DRAFT LETTER TO MEDIATOR ENCLOSING SIGNED MEDIATION AGREEMENT	0.20 hrs.	70.00
11/18/2008	CRJ	PREPARE FOR AND ATTEND CASE MANAGEMENT CONFERENCE	1.00 hrs.	350.00
11/18/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Case Management Conference	0.20 hrs.	70.00
11/18/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Case Management Order	0.20 hrs.	70.00
11/18/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Pretrial Order	0.20 hrs.	70.00
11/18/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order Referring Case to Mediation	0.20 hrs.	70.00
11/21/2008	CRJ	MEET WITH C. VRSCAK TO REVIEW DOCUMENT PRODUCTION	0.50 hrs.	175.00
11/21/2008	CRJ	MEET WITH M. LALLY TO DISCUSS WITNESSES, DOCUMENTS AND MEDIATION	1.50 hrs.	525.00
11/21/2008	CJV	MEETING WITH CRJ TO REVIEW DOCUMENT PRODUCTION	0.50 hrs.	57.50

11/21/2008	CJV	PREPARE DOCUMENT PRODUCTION	3.00 hrs.	345.00
11/23/2008	CJV	BATES LABEL DOCUMENTS	1.00 hrs.	115.00
11/24/2008	CRJ	EXCHANGE EMAIL WITH CLIENT RE: STATUS	0.20 hrs.	70.00
11/24/2008	CJV	BEGIN REVISED DOCUMENT INDEX	1.00 hrs.	115.00
11/25/2008	CJV	CONTINUE REVISED DOCUMENT INDEX	3.90 hrs.	448.50
11/26/2008	CJV	CORRECT BATES LABELING ON CERTAIN DOCUMENTS; COMPLETE REVISED DOCUMENT INDEX	1.70 hrs.	195.50
12/01/2008	CJV	PULL AND SCAN DOCUMENTS FOR MEDIATOR	0.30 hrs.	34.50
12/02/2008	CJV	DRAFT RULE 26 (A) DISCLOSURES; REPRODUCE DOCUMENTS; RE-BATES LABEL CERTAIN DOCUMENTS; CORRECT DOCUMENT INDEX	5.10 hrs.	586.50
12/03/2008	CRJ	MEET WITH CLIENT, C. VRSAK, M. LALLY TO PREPARE FOR MEDIATION	2.50 hrs.	875.00
12/03/2008	CRJ	DRAFT LETTER TO DEFENSE COUNSEL ENCLOSING PLAINTIFF'S INITIAL DISCLOSURES	0.20 hrs.	70.00
12/03/2008	CJV	READ CASE MANAGEMENT ORDER	0.20 hrs.	23.00
12/03/2008	CJV	MEETING WITH CRJ, CLIENTS AND MICHELLE LALLY	2.50 hrs.	287.50
12/08/2008	CRJ	DRAFT PLAINTIFF'S FIRST SET OF INTERROGATORIES AND DOCUMENT REQUEST	2.50 hrs.	875.00
12/08/2008	CRJ	MEET WITH CLIENT TO REVIEW ITEMS FOR MEDIATION	0.50 hrs.	175.00
12/08/2008	CRJ	SEND EMAIL TO CLIENT WITH ATTACHED DRAFT OF PLAINTIFF'S 1ST SET OF INTERROGATORIES AND DOCUMENT REQUEST	0.20 hrs.	70.00
12/08/2008	CRJ	ATTEND MEDIATION; MEET WITH CLIENT TO REVIEW DEFENDANT'S INITIAL DISCLOSURES	4.50 hrs.	1,575.00
12/09/2008	CRJ	REVISE PLAINTIFF'S FIRST SET OF INTERROGATORIES AND DOCUMENT REQUEST	0.50 hrs.	175.00
12/09/2008	CRJ	EXCHANGE EMAIL WITH CLIENT RE: FINAL DRAFT OF PLAINTIFF'S FIRST SET OF INTERROGATORIES AND DOCUMENT REQUEST	0.20 hrs.	70.00
12/10/2008	CRJ	PHONE CONFERENCE WITH M. LALLY RE: STATUS AND STRATEGY	0.50 hrs.	175.00
12/16/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Report of Mediation	0.20 hrs.	70.00

12/22/2008	CRJ	DRAFT ADR EVALUATION FORM	0.20 hrs.	70.00
12/23/2008	CJV	BEGIN REVIEW AND INDEX OF DOCUMENTS PRODUCED BY DEFENDANT	1.70 hrs.	195.50
12/29/2008	CJV	REVIEW/INDEX DEFENDANT'S DOCUMENTS	4.50 hrs.	517.50
12/30/2008	CRJ	SEND EMAIL TO CLIENT RE: STATUS OF MEDIATION	0.20 hrs.	70.00
12/30/2008	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Report of Mediation	0.20 hrs.	70.00
12/30/2008	CRJ	PHONE CONFERENCE WITH MEDIATOR RE: DEFENDANT'S DECISION NOT TO FURTHER MEDIATE	0.20 hrs.	70.00
12/30/2008	CJV	REVIEW/INDEX DEFENDANT'S DOCUMENTS	2.00 hrs.	230.00
01/19/2009	CRJ	MEET WITH CLIENT TO OBTAIN DOCUMENTS FOR DISCOVERY PRODUCTION	0.30 hrs.	105.00
01/28/2009	NVL	DRAFT PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST SET OF INTERROGATORIES.	2.00 hrs.	350.00
02/02/2009	CJV	REVIEW/INDEX DOCUMENTS	1.90 hrs.	218.50
02/03/2009	NVL	DRAFT PLAINTIFF'S RESPONSES TO DEFENDANT'S FIRST SET OF INTERROGATORIES AND REQUEST FOR DOCUMENTS.	0.40 hrs.	70.00
02/04/2009	CJV	REVIEW/INDEX DOCUMENTS	3.60 hrs.	414.00
02/05/2009	NVL	FILE ENTRY OF APPEARANCE IN CASE.	0.20 hrs.	35.00
02/05/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order	0.20 hrs.	70.00
02/05/2009	CRJ	SEND EMAIL TO CLIENT RE: UPDATE	0.20 hrs.	70.00
02/05/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Notice of Appearance	0.20 hrs.	70.00
02/05/2009	CRJ	PHONE CONFERENCE WITH M. NICKLES RE: STATUS CONFERENCE	0.20 hrs.	70.00
02/05/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Motion for Miscellaneous Relief	0.20 hrs.	70.00
02/05/2009	CJV	REVIEW/INDEX DOCUMENTS	4.30 hrs.	494.50
02/06/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v.	0.20 hrs.	70.00

Date	Code	Description	Hours	Amount
		UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Set Deadlines/Hearings		
02/06/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: STATUS	0.20 hrs.	70.00
02/06/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order	0.20 hrs.	70.00
02/06/2009	CJV	REVIEW/INDEX DOCUMENTS	4.80 hrs.	552.00
02/09/2009	CRJ	SEND EMAIL TO CLIENT REQUESTING ADDITIONAL DOCUMENTS TO PRODUCE	0.20 hrs.	70.00
02/09/2009	CRJ	REVIEW ANSWERS TO DEFENDANT'S FIRST SET OF WRITTEN DISCOVERY	2.00 hrs.	700.00
02/09/2009	CJV	REVIEW/INDEX DOCUMENTS; REPRODUCE AND BATES LABEL EEOC DOCUMENTS CONTAINED WITHIN FILE	6.00 hrs.	690.00
02/10/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order	0.20 hrs.	70.00
02/10/2009	CRJ	MEET WITH M. LALLY TO DISCUSS STATUS	0.50 hrs.	175.00
02/10/2009	CJV	REVIEW/INDEX DOCUMENTS	4.00 hrs.	460.00
02/11/2009	CRJ	REVIEW EMAILS FROM CLIENT RE: PREPARATION FOR DEPOSITIONS	1.00 hrs.	350.00
02/11/2009	CRJ	MEET WITH CLIENT TO REVIEW DOCUMENTS AND PREPARE FOR DEPOSITION	3.00 hrs.	1,050.00
02/11/2009	CJV	REVIEW/INDEX DOCUMENTS	4.40 hrs.	506.00
02/12/2009	CJV	REVIEW/INDEX DOCUMENTS	4.20 hrs.	483.00
02/16/2009	CRJ	DRAFT NOTICES OF DEPOSITION	0.40 hrs.	140.00
02/17/2009	NVL	DRAFT CONFIDENTIAL POSITION LETTER AND PROPOSED SETTLEMENT AGREEMENT.	1.50 hrs.	262.50
02/17/2009	CRJ	REVISE CONFIDENTIAL POSITION PAPER AND SETTLEMENT AGREEMENT; SEND EMAIL TO J. SCHWAB WITH SAME ATTACH	1.50 hrs.	525.00
02/18/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: DEPOSITION SCHEDULE	0.20 hrs.	70.00
02/18/2009	CRJ	RECEIVE AND REVIEW CLIENT'S SIGNED VERIFICATION; DRAFT LETTER TO M. NICKLES ENCLOSING SAME	0.20 hrs.	70.00
02/18/2009	CJV	UPDATE DISCOVERY BINDER AND INDEX	1.00 hrs.	115.00
02/20/2009	NVL	PREPARE FOR AND ATTEND STATUS CONFERENCE.	1.00 hrs.	175.00

02/20/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: STATUS	0.40 hrs.	140.00
02/20/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Status Conference	0.20 hrs.	70.00
02/20/2009	CJV	TELEPHONE CALLS WITH COURT REPORTERS IN KENTUCKY	0.50 hrs.	57.50
02/20/2009	CJV	DRAFT AMENDED NOTICE OF DEPOSITION - HERON	0.30 hrs.	34.50
02/20/2009	CJV	DRAFT LETTER TO ATTORNEY NICKLES RE: AMENDED DEPOSITION NOTICE - HERON	0.20 hrs.	23.00
02/23/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Update Deadlines	0.20 hrs.	70.00
02/23/2009	CRJ	REVIEW LETTER FOR DEFENSE COUNSEL RE: DISCOVERY ISSUES; REVIEW PLAINTIFF'S INTERROGATORY ANSWERS	0.50 hrs.	175.00
02/23/2009	CRJ	EXCHANGE EMAIL WITH CLIENT RE: DISCOVERY ISSUES	0.40 hrs.	140.00
02/24/2009	CJV	DRAFT E-MAIL TO ATTORNEY NICKLES	0.30 hrs.	34.50
02/25/2009	CRJ	MEET WITH CLIENT TO PREPARE FOR DEPOSITION	1.00 hrs.	350.00
02/25/2009	CRJ	ATTEND DEPOSITION OF CLIENT; MEET WITH CLIENT AFTER DEPOSITION	6.00 hrs.	2,100.00
02/25/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Notice (Other)	0.20 hrs.	70.00
02/25/2009	CJV	UPDATE DISCOVERY BINDER AND INDEX	1.50 hrs.	172.50
02/25/2009	CJV	DRAFT E-MAIL TO ATTORNEY NICKLES	0.10 hrs.	11.50
02/25/2009	CJV	RECEIVE CALL FROM CRJ, REVIEW FILE MATERIAL RE: CLIENT NOTES ON 10/24/06 MEETING	0.20 hrs.	23.00
02/26/2009	CRJ	PHONE CONFERENCE WITH M. LALLY RE: STATUS, CLIENT'S DEPOSITION	0.50 hrs.	175.00
02/26/2009	CJV	SCAN ALL DOCUMENTS PRODUCED BY DEFENDANT	2.00 hrs.	230.00
02/27/2009	CRJ	EXCHANGE EMAIL WITH M. NICKLES RE: DEPOSITION SCHEDULE	0.20 hrs.	70.00
03/02/2009	CRJ	EXCHANGE EMAIL WITH M. NICKLES RE: DEPOSITION SCHEDULE	0.20 hrs.	70.00
03/03/2009	NVL	REVIEW PRODUCED DOCUMENTS FOR DEPOSITION OF D. HERON AND DISCUSS	3.00 hrs.	525.00

		SAME WITH CRJ.		
03/03/2009	CRJ	REVIEW FILE TO PREP FOR DEPOS OF DEF WITNESSES; VARIOUS PHONE CALL/EMAIL COMMUNICATION RE: SAME	10.40 hrs.	3,640.00
03/03/2009	CRJ	DRAFT NOTICES OF DEPOSITION - J. GREENBERGER, C. BOGOSTA; DRAFT LETTER TO M. NICKLES ENCLOSING SAME	0.20 hrs.	70.00
03/03/2009	CJV	UPDATE DISCOVERY INDEX	1.00 hrs.	115.00
03/03/2009	CJV	REPRODUCE DOCUMENTS FOR HERON DEPOSITION	1.00 hrs.	115.00
03/04/2009	NVL	PREPARE DOCUMENTS FOR AND ATTEND DEPOSITION OF D. HERON.	9.50 hrs.	1,662.50
03/04/2009	CRJ	MEET WITH CLIENT TO REVIEW POINTS FOR DEPOSITION OF D. HERON	1.00 hrs.	350.00
03/04/2009	CRJ	CONDUCT DEPOSITION OF DWIGHT HERON	9.00 hrs.	3,150.00
03/04/2009	CJV	REVIEW/ORGANIZE DOCUMENTS FOR DEPOSITION	2.50 hrs.	287.50
03/05/2009	CRJ	REVIEW CLIENT NOTES TO PREPARE FOR DEPOSITIONS	2.50 hrs.	875.00
03/06/2009	CJV	E-MAIL TO ATTORNEY NICKLES	0.10 hrs.	11.50
03/08/2009	CRJ	PREPARE FOR DEPOSITION TO T. ZANANDREA	3.70 hrs.	1,295.00
03/09/2009	NVL	ATTEND DEPOSITION OF T. ZANANDREA.	6.50 hrs.	1,137.50
03/09/2009	NVL	REVIEW CLIENT'S NOTES RE T. ZANANDREA IN PREPARATION FOR DEPOSITION.	0.30 hrs.	52.50
03/09/2009	CRJ	MEETING WITH CLIENT TO REVIEW DOCUMENTS/NOTES FOR DEPOSITION TO T. ZANANDREA	1.00 hrs.	350.00
03/09/2009	CRJ	PREPARE FOR DEPOSITION OF T. ZANANDREA	1.00 hrs.	350.00
03/09/2009	CRJ	PREPARE FOR DEPOSITION OF JOHN PIEMME	1.00 hrs.	350.00
03/09/2009	CRJ	CONDUCT DEPOSITION OF TONI ZANANDREA	6.50 hrs.	2,275.00
03/09/2009	CJV	TELEPHONE CALL WITH ATTORNEY NICKLES' OFFICE RE: UPMC DOCUMENT 113	0.10 hrs.	11.50
03/09/2009	CJV	REVIEW/ORGANIZE PRODUCTION DOCUMENTS	2.50 hrs.	287.50
03/10/2009	NVL	MEET WITH CRJ AND CLIENT RE DISCOVERY MATTERS.	2.50 hrs.	437.50
03/10/2009	NVL	ATTEND DEPOSITION OF JOHN PIEMME.	3.00 hrs.	525.00

03/10/2009	CRJ	MEET WITH N. LYKOS AND CLIENT RE: DISCOVERY MATTERS	2.50 hrs.	875.00
03/10/2009	CRJ	PHONE CONFERENCE WITH M. NICKLES RE: DEPOSITIONS SCHEDULE	0.20 hrs.	70.00
03/10/2009	CRJ	DRAFT REVISED NOTICES OF DEPOSITION	0.30 hrs.	105.00
03/10/2009	CRJ	DRAFT PLAINTIFF'S SECOND SET OF INTERROGATORIES AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS	0.80 hrs.	280.00
03/10/2009	CRJ	DRAFT LETTER TO M. NICKLES RE: DEFICIENCIES IN DEFENDANT'S RESPONSE TO PLAINTIFF'S DOCUMENT REQUESTS	0.50 hrs.	175.00
03/10/2009	CRJ	PREPARE FOR DEPOSITION OF JOHN PIEMME	1.00 hrs.	350.00
03/10/2009	CRJ	CONDUCT DEPOSITION OF JOHN PIEMME	3.00 hrs.	1,050.00
03/11/2009	CJV	TELEPHONE CALL WITH QUALITY DEPOSITION SERVICES RE: ROSENSTEIN DEPOSITION	0.10 hrs.	11.50
03/12/2009	CJV	TELEPHONE CALL WITH SOUTHEASTERN COURT REPORTING RE: ROSENSTEIN DEPOSITION	0.10 hrs.	11.50
03/12/2009	CJV	TELEPHONE CALL WITH RON BUNCH @ BUNCH COURT REPORTING & VIDEO RE: ROSENSTEIN DEPOSITION	0.20 hrs.	23.00
03/13/2009	CJV	TELEPHONE CALL WITH HAMPTON INN RE: CONFIRM CONFERENCE ROOM	0.10 hrs.	11.50
03/13/2009	CJV	TELEPHONE CALL WITH HAMPTON INN RE: CHANGE CONFIRMATION DATE; RECEIVE FAX VERIFYING SAME	0.20 hrs.	23.00
03/15/2009	CRJ	REVIEW DOCUMENTS TO PREPARE FOR DEPOSITIONS	1.00 hrs.	350.00
03/16/2009	CJV	REVIEW/ORGANIZE DOCUMENTS FOR DEPOSITION	1.00 hrs.	115.00
03/17/2009	NVL	MEET WITH CRJ TO REVIEW DOCUMENTS AND PREPARE FOR DEPO OF J. SCARANO.	1.00 hrs.	175.00
03/17/2009	NVL	ATTEND DEPOSITION OF J. SCARANO.	8.30 hrs.	1,452.50
03/17/2009	CRJ	CONDUCT DEPOSITION OF JAMIE SCARANO	8.30 hrs.	2,905.00
03/17/2009	CRJ	Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Transcript	0.20 hrs.	70.00
03/17/2009	CRJ	MEET WITH N. LYKOS TO PREPARE FOR DEPOSITION OF JAMIE SCARANO	1.00 hrs.	350.00

03/17/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Terminate Deadlines	0.20 hrs.	70.00
03/18/2009	CRJ	EXCHANGE EMAIL WITH CLIENT RE: STATUS	0.20 hrs.	70.00
03/18/2009	CJV	REVIEW DOCUMENTS; REPRODUCE THOSE FOR USE IN SHIRING DEPOSITION	2.50 hrs.	287.50
03/19/2009	NVL	ATTEND DEPOSITION OF BETH SHIRING.	6.80 hrs.	1,190.00
03/19/2009	CRJ	REVIEW EXHIBITS TO PREPARE FOR DEPOSITION OF B. SHIRING	1.00 hrs.	350.00
03/19/2009	CRJ	CONDUCT DEPOSITION OF BETH SHIRING	6.80 hrs.	2,380.00
03/20/2009	CJV	RECEIVE TELEPHONE CALL FROM RON BUNCH	0.10 hrs.	11.50
03/20/2009	CJV	PREPARE FAX TO RON BUNCH	0.10 hrs.	11.50
03/20/2009	CJV	REVIEW DOCUMENTS RE: IDENTIFY THOSE FOR USE IN ROSS AND GREENBERGER DEPOSITIONS	1.20 hrs.	138.00
03/24/2009	NVL	ATTEND STATUS CONFERENCE WITH COURT AND MEET WITH CRJ TO DISCUSS UPDATED TRIAL SCHEDULE.	0.70 hrs.	122.50
03/24/2009	NVL	EMAIL CLIENT TO UPDATE HER ON NEW TRIAL SCHEDULE.	0.20 hrs.	35.00
03/24/2009	CRJ	ATTEND STATUS CONFERENCE; MEET WITH N. LYKOS RE: SAME	0.70 hrs.	245.00
03/24/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: STATUS	0.40 hrs.	140.00
03/24/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Pretrial Order	0.20 hrs.	70.00
03/24/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Status Conference	0.20 hrs.	70.00
03/25/2009	CJV	MEET WITH CRJ RE: EXHIBITS FOR DR. ROSENSTEIN'S DEPOSITION; REPRODUCE SAME	1.00 hrs.	115.00
03/26/2009	NVL	ATTEND DEPOSITION OF C. BAGOSTA.	1.80 hrs.	315.00
03/26/2009	NVL	MEET WITH CRJ AND CLIENT REGARDING DEPOSITIONS.	1.00 hrs.	175.00
03/26/2009	CRJ	MEET WITH N. LYKOS AND CLIENT BEFORE DEPOSITON	0.50 hrs.	175.00
03/26/2009	CRJ	CONDUCT DEPOSITION OF CHARLES BAGOSTA	1.80 hrs.	630.00
03/26/2009	CRJ	MEET WITH N. LYKOS AND CLIENT RE:	1.00 hrs.	350.00

		DEPOSITIONS		
03/26/2009	CRJ	PREPARE FOR DEPOSITION OF CHARLES BAGOSTA	1.00 hrs.	350.00
03/26/2009	CJV	RECEIVE TELEPHONE CALL FROM RON BUNCH	0.10 hrs.	11.50
03/27/2009	NVL	REVIEW DOCUMENTS FOR AND ATTEND DEPOSITION OF GREG ROSS.	5.00 hrs.	875.00
03/27/2009	CRJ	MEET WITH CLIENT TO DISCUSS DEPOSITION OF GREG ROSS	0.50 hrs.	175.00
03/27/2009	CRJ	CONDUCT DEPOSITION OF GREG ROSS	5.00 hrs.	1,750.00
03/27/2009	CRJ	MEET WITH CLIENT AFTER DEPOSITION OF GREG ROSS	0.50 hrs.	175.00
03/27/2009	CJV	RECEIVE CALL FROM MR. BUNCH	0.10 hrs.	11.50
03/27/2009	CJV	TELEPHONE CALL WITH MR. BUNCH RE: EXHIBITS	0.10 hrs.	11.50
03/28/2009	CRJ	CONDUCT DEPOSITION OF MAURY ROSENSTEIN	4.00 hrs.	1,400.00
03/28/2009	CRJ	MEET WITH CLIENT TO DISCUSS MAURY ROSENSTEIN'S DEPOSITION	0.50 hrs.	175.00
03/30/2009	CRJ	PREPARE FOR DEPOSITION OF DR. GREENBERGER	0.70 hrs.	245.00
03/30/2009	CJV	REPRODUCE DR. MILES' RECORDS, BATES LABEL SAME	0.40 hrs.	46.00
03/31/2009	CJV	TELEPHONE CALL WITH RON BUNCH	0.10 hrs.	11.50
04/01/2009	CRJ	CONDUCT DEPOSITION OF JOEL GREENBERGER; MEET WITH CLIENT BEFORE/AFTER TO DISCUSS	3.70 hrs.	1,295.00
04/02/2009	NVL	PHONE CONFERENCE WITH CRJ AND POTENTIAL WITNESS	0.20 hrs.	35.00
04/02/2009	NVL	MEET WITH CRJ RE ADDITIONAL DISCOVERY REQUESTS AND TO PREPARE FOR DEPOSITION OF PETER ELLIS.	2.00 hrs.	350.00
04/02/2009	CRJ	CONDUCT DEPOSITION OF P. ELLIS; MEET WITH CLIENT BEFORE/AFTER	2.30 hrs.	805.00
04/02/2009	CRJ	MEET WITH LYKOS RE: ADDITIONAL DISCOVERY REQUESTS, PREPARATION FOR DEPOSITION OF P. ELLIS	2.00 hrs.	700.00
04/02/2009	CRJ	PHONE CONFERENCE WITH WITNESS AND N. LYKOS	0.20 hrs.	70.00
04/03/2009	CJV	REVIEW/COMPARE 2ND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION TO 3RD SET	0.30 hrs.	34.50
04/09/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: STATUS	0.30 hrs.	105.00
04/09/2009	CRJ	PHONE CONFERENCE WITH M. LALLY RE: STATUS	0.50 hrs.	175.00

04/14/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Notice of Appearance	0.20 hrs.	70.00
04/23/2009	CRJ	MEET WITH WITNESS TO PREPARE FOR TRIAL	2.50 hrs.	875.00
05/08/2009	CJV	TELEPHONE CALLS WITH RON BUNCH AND POLLY SMITH RE: DEPOSITION TRANSCRIPT OF DR. ROSENSTEIN	0.20 hrs.	23.00
05/08/2009	CJV	RECEIVE FAX FROM POLLY SMITH RE: INVOICE FOR DR. ROSENSTEIN'S DEPOSITION	0.10 hrs.	11.50
05/20/2009	NVL	REVIEW JOINT MOTION TO CONTINUE TRIAL RECEIVED FROM M. NICKLES.	0.20 hrs.	35.00
05/20/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Motion to Continue	0.20 hrs.	70.00
05/21/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order on Motion to Continue	0.20 hrs.	70.00
05/26/2009	CRJ	DRAFT PLAINTIFF'S PRETRIAL STATEMENT	2.00 hrs.	700.00
05/27/2009	NVL	DRAFT MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL STATEMENT AND PROPOSED ORDER.	0.40 hrs.	70.00
05/27/2009	NVL	REVIEW AND REVISE PLAINTIFF'S PRETRIAL STATEMENT; DRAFT DAMAGES EXHIBIT FOR PRETRIAL STATEMENT.	2.00 hrs.	350.00
05/27/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Motion for Extension of Time to File	0.20 hrs.	70.00
05/27/2009	CJV	REVIEW DOCUMENTS; UPDATE DOCUMENT INDEX	5.20 hrs.	598.00
05/28/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order on Motion for Extension of Time to File	0.20 hrs.	70.00
05/28/2009	CJV	REVIEW DOCUMENTS, UPDATE DOCUMENT INDEX	4.80 hrs.	552.00
05/29/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Motion to Continue	0.20 hrs.	70.00

05/29/2009	CRJ	Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Set Deadlines/Hearings	0.20 hrs.	70.00
07/09/2009	CJV	REVIEW ADDITIONAL DOCUMENTS, UPDATE DOCUMENT INDEX	5.40 hrs.	621.00
07/10/2009	CJV	UPDATE DISCOVERY BINDER AND INDEX	1.00 hrs.	115.00
07/20/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF J. GREENBERGER FOR TRIAL PREPARATION	2.50 hrs.	875.00
07/22/2009	NVL	MEET WITH CRJ AND CV TO REVIEW DOCUMENTS AND DEPO TESTIMONY FOR PREPARATION OF PRETRIAL STATEMENT.	5.50 hrs.	962.50
07/22/2009	CRJ	REVIEW DOCUMENT PRODUCTION WITH N. LYKOS, C. VRSCAK TO PREPARE PLAINTIFF'S PRETRIAL STATEMENT	5.50 hrs.	1,925.00
07/22/2009	CJV	REVIEW DOCUMENTS IN ORDER TO PREPARE PRE TRIAL EXHIBIT LIST	5.50 hrs.	632.50
07/23/2009	NVL	REVIEW CLIENT'S EMPLOYMENT CONTRACT AND PREPARE DAMAGES EXHIBIT FOR PRETRIAL STATEMENT.	1.00 hrs.	175.00
07/23/2009	NVL	CALL CLIENT RE DAMAGES INFORMATION FOR PRE-TRIAL STATEMENT.	0.20 hrs.	35.00
07/23/2009	NVL	REVIEW DEPO TRANSCRIPT OF M. ROSENSTEIN FOR EXCERPTS TO BE DESIGNATED FOR TRIAL.	0.50 hrs.	87.50
07/24/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF C. BAGOSTA FOR TRIAL PREPARATION	2.00 hrs.	700.00
07/24/2009	CJV	BEGIN DRAFT OF EXHIBIT LIST FOR PRE TRIAL STATEMENT	4.30 hrs.	494.50
07/26/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF JOHN PIEMME FOR TRIAL PREPARATION	3.00 hrs.	1,050.00
07/26/2009	CRJ	DRAFT PRETRIAL STMT; MEET WITH C. VRSCAK TO REVIEW DOCUMENT PROD FOR SELECTION OF TRIAL EXHIBITS	4.30 hrs.	1,505.00
07/26/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF M. ROSENSTEIN TO DESINGATE EXCERPTS FOR PRETRIAL STATEMENT	3.00 hrs.	1,050.00
07/26/2009	CJV	MEET WITH CRJ TO REVIEW DOCUMENT PRODUCTION, CONTINUE DRAFT OF EXHIBIT LIST	4.00 hrs.	460.00
07/27/2009	CRJ	REVISE PRETRIAL STATEMENT	2.00 hrs.	700.00
07/27/2009	CJV	CONTINUE DRAFT OF EXHIBIT LIST	4.50 hrs.	517.50

07/28/2009	CRJ	MEET WITH C. VRSCAK TO FINALIZE PLAINTIFF'S PRETRIAL STATEMENT	3.50 hrs.	1,225.00
07/28/2009	CJV	CONTINUE DRAFT OF PRETRIAL EXHIBIT LIST	2.00 hrs.	230.00
07/28/2009	CJV	MEET WITH CRJ TO FINALIZE PLAINTIFF'S PRETRIAL STATEMENT	3.50 hrs.	402.50
07/29/2009	NVL	REVIEW AND REVISE PRETRIAL STATEMENT.	1.00 hrs.	175.00
07/29/2009	NVL	DRAFT OFFERS OF PROOF FOR WITNESSES IDENTIFIED IN PRETRIAL STATEMENT.	0.50 hrs.	87.50
07/29/2009	CRJ	DRAFT AND REVISE PLAINTIFF'S PRETRIAL STATEMENT	5.00 hrs.	1,750.00
07/29/2009	CRJ	MEET WITH C. VRSCAK TO REVIEW DOCUMENT PRODUCTION AND IDENTIFY TRIAL EXHIBITS	2.70 hrs.	945.00
07/29/2009	CJV	MEET WITH CRJ TO REVIEW DOCUMENT PRODUCTION AND IDENTIFY TRIAL EXHIBITS	2.70 hrs.	310.50
07/29/2009	CJV	REVISE PRETRIAL EXHIBIT LIST	0.60 hrs.	69.00
07/30/2009	NVL	REVISE DAMAGES CALCULATION EXHIBIT TO PRETRIAL STATEMENT TO INCLUDE NH AND ST. MARGARET'S POSITIONS.	1.00 hrs.	175.00
07/30/2009	CJV	REVIEW FILE RE: DOCUMENTS REQUESTED BY DEFENSE COUNSEL	1.00 hrs.	115.00
07/31/2009	CRJ	MEET WITH C. VRSCAK TO REVIEW MEDICAL RECORD DOCUMENT PRODUCTION	0.30 hrs.	105.00
07/31/2009	CJV	REPRODUCE DOCUMENTS; DRAFT LETTER TO ATTORNEY NICKLES ENCLOSING SAME	0.40 hrs.	46.00
07/31/2009	CJV	MEET WITH CRJ TO REVIEW MEDICAL RECORD DOCUMENT PRODUCTION	0.30 hrs.	34.50
08/04/2009	NVL	RESEARCH RE EXCLUDING EVIDENCE OF SPOUSE'S INCOME; MEET WITH CRJ	2.00 hrs.	350.00
08/04/2009	NVL	CALL A. FELDSTEIN RE JURY INSTRUCTIONS, VERDICT SLIP AND JOINT STIPULATIONS.	0.20 hrs.	35.00
08/04/2009	NVL	REVIEW DRAFT VERDICT SLIP.	0.30 hrs.	52.50
08/04/2009	NVL	DRAFT MOTION IN LIMINE TO EXCLUDE EVIDENCE OF SPOUSE'S INCOME.	0.30 hrs.	52.50
08/04/2009	CRJ	MEET WITH N. LYKOS TO DISCUSS MOTIONS IN LIMINE; RESEARCH MOTIONS IN LIMINE - SPOUSE'S INCOME ISSUE	2.00 hrs.	700.00
08/04/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v.	0.20 hrs.	70.00

Date	Party	Description	Hours	Amount
		UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Set Hearings		
08/05/2009	NVL	DRAFT MOTION IN LIMINE RE EVIDENCE OF LOST WAGES AND MITIGATION.	0.50 hrs.	87.50
08/05/2009	NVL	DRAFT MOTION IN LIMINE RE UNEMPLOYMENT COMPENSATION BENEFITS.	0.40 hrs.	70.00
08/05/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Notice of Appearance	0.20 hrs.	70.00
08/06/2009	CJV	REVIEW DEPOSITION EXHIBITS	0.30 hrs.	34.50
08/07/2009	NVL	MEET WITH CRJ AND CV RE: VARIOUS TRIAL MATTERS	2.00 hrs.	350.00
08/07/2009	CRJ	PHONE CONF WITH COURT CLERK RE: NEW TRIAL DATE AVAILABILITY; PHONE CONF WITH M. NICKLES RE: SAME	0.20 hrs.	70.00
08/07/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: TRIAL DATE, DOCUMENT PRODUCTION	0.20 hrs.	70.00
08/07/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Witness List	0.20 hrs.	70.00
08/07/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Pretrial Statement	0.20 hrs.	70.00
08/07/2009	CRJ	MEET WITH C. VRSCAK AND N. LYKOS TO DISCUSS VARIOUS PRETRIAL MATTERS	2.00 hrs.	700.00
08/07/2009	CJV	UPDATE DOCUMENT INDEX AND DISCOVERY BINDER	0.50 hrs.	57.50
08/07/2009	CJV	MEET WITH CRJ AND NVL TO DISCUSS VARIOUS PRETRIAL MATTERS	2.00 hrs.	230.00
08/07/2009	CJV	REVIEW ADDITIONAL DISCOVERY PRODUCED BY DEFENDANTS	0.30 hrs.	34.50
08/10/2009	NVL	RESEARCH WHETHER MEDICAL RECORDS ARE ADMISSIBLE UNDER RULE OF EVIDENCE 803(6).	0.50 hrs.	87.50
08/10/2009	NVL	MEET WITH CJV TO REVIEW DESIGNATION OF DEPOSITION TESTIMONY FOR TRIAL.	0.50 hrs.	87.50
08/10/2009	NVL	MEET WITH CRJ TO DISCUSS AND DRAFT MOTIONS IN LIMINE.	2.50 hrs.	437.50
08/10/2009	CRJ	REVIEW DEFENDANT'S PRETRIAL STATEMENT AND WITNESS LIST	1.00 hrs.	350.00

08/10/2009	CRJ	REVISE UNIFIED SET OF JURY INSTRUCTIONS	0.50 hrs.	175.00
08/10/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Designation of Deposition Excerpts	0.20 hrs.	70.00
08/10/2009	CRJ	FINALIZE DISCOVERY EXCERPTS; DRAFT PLAINTIFF'S DEPOSITION DESIGNATIONS	0.40 hrs.	140.00
08/10/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: DEFENDANT'S PRETRIAL STATEMENT AND WITNESS LIST	0.70 hrs.	245.00
08/10/2009	CRJ	DRAFT MOTIONS IN LIMINE; MEET WITH N. LYKOS	5.70 hrs.	1,995.00
08/10/2009	CJV	MEET WITH NVL TO REVIEW DEPOSITION DESIGNATIONS	0.50 hrs.	57.50
08/11/2009	NVL	REVISE MOTIONS IN LIMINE AND BRIEFS RE UC BENEFITS, EEOC OPINION, BACK PAY, AND RETALIATION CLAIM.	1.50 hrs.	262.50
08/11/2009	CRJ	DRAFT MOTIONS IN LIMINE; REVISE JURY INSTRUCTIONS; MEET WITH CV RE: MOTIONS IN LIMINE	7.80 hrs.	2,730.00
08/11/2009	CJV	MEET WITH CRJ RE: MOTIONS IN LIMINE	0.30 hrs.	34.50
08/12/2009	NVL	REVIEW AND REVISE MOTIONS IN LIMINE AND SUPPORTING BRIEFS.	2.00 hrs.	350.00
08/12/2009	NVL	REVIEW PROPOSED JURY INSTRUCTIONS.	0.50 hrs.	87.50
08/12/2009	CRJ	DRAFT AND REVISE PLAINTIFF'S MOTIONS IN LIMINE AND SUPP BRIEFS; REVIEW AND REVISE JOINT JURY INSTRUC	7.50 hrs.	2,625.00
08/12/2009	CJV	REVIEW/PROOF PLAINTIFF'S MOTIONS IN LIMINE	2.00 hrs.	230.00
08/13/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Status Conference	0.20 hrs.	70.00
08/13/2009	CRJ	ATTEND STATUS CONFERENCE	1.00 hrs.	350.00
08/13/2009	CRJ	Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Pretrial Order	0.20 hrs.	70.00
08/13/2009	CRJ	Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order	0.20 hrs.	70.00

		Referring Case to Mediation		
08/13/2009	CRJ	MEET W/ C. VRSCAK RE: STATUS CONFERENCE, PRETRIAL SCHEDULE; PREP APPENDIX TO PLTF'S MOTIONS IN LIMIN	1.50 hrs.	525.00
08/13/2009	CRJ	MEET WITH MICHELLE LALLY TO REVIEW DOCUMENT PRODUCTION	2.50 hrs.	875.00
08/13/2009	CRJ	REVIEW DEFENDANT'S PRETRIAL STATEMENT, WITNESS LIST, VIDEO DEPOSITIONS AND MOTIONS IN LIMINE	5.50 hrs.	1,925.00
08/13/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: STATUS CONFERENCE, PRETRIAL ISSUES; MEET WITH CV	0.50 hrs.	175.00
08/13/2009	CJV	MEET WITH CRJ RE: STATUS CONFERENCE, PRETRIAL SCHEDULE, PREP APPENDIX TO PLAINTIFF'S MOTIONS IN LIMINE	1.50 hrs.	172.50
08/13/2009	CJV	REVIEW/ORGANIZE FILE	1.00 hrs.	115.00
08/14/2009	CRJ	DRAFT MEDIATION STATEMENT	0.50 hrs.	175.00
08/14/2009	CRJ	REVISE PROPOSED JURY INSTRUCTIONS	3.50 hrs.	1,225.00
08/14/2009	CRJ	REVIEW TRIAL EXHIBITS	1.00 hrs.	350.00
08/14/2009	CRJ	Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order on Motion to Amend/Correct	0.20 hrs.	70.00
08/14/2009	CRJ	MEET WITH C. VRSCAK TO DISCUSS MEDIATION AND TRIAL EXHIBIT ISSUES	1.00 hrs.	350.00
08/14/2009	CJV	MEET WITH CRJ TO DISCUSS MEDIATION AND TRIAL EXHIBIT ISSUES	1.00 hrs.	115.00
08/14/2009	CJV	COMPARE PRETRIAL LISTS; DETERMINE JOINT DESIGNATIONS	3.20 hrs.	368.00
08/17/2009	CLD	RESEARCH REGARDING FAMILY RESPONSIBILITIES DISCRIMINATION	0.40 hrs.	72.00
08/17/2009	CJV	PROOF MEDIATION STATEMENT	0.20 hrs.	23.00
08/17/2009	CJV	BEGIN ASSEMBLY OF EXHIBIT BINDERS AND INDEXES	4.80 hrs.	552.00
08/17/2009	CJV	TELEPHONE CALL WITH ATTORNEY NICKLES' OFFICE	0.10 hrs.	11.50
08/18/2009	CJV	CONTINUE ASSEMBLY OF EXHIBIT BINDERS AND INDEXES	5.40 hrs.	621.00
08/19/2009	CLD	RESEARCH REGARDING FAMILY RESPONSIBILITIES DISCRIMINATION	0.70 hrs.	126.00
08/19/2009	CJV	CONTINUE ASSEMBLY OF EXHIBIT BINDERS	6.30 hrs.	724.50
08/20/2009	CLD	RESEARCH REGARDING FAMILY RESPONSIBILITIES DISCRIMINATION; TELEPHONE CONFERENCE WITH C. JOHNSTON REGARDING SAME	0.90 hrs.	162.00

08/20/2009	CJV	CONTINUE ASSEMBLY OF EXHIBIT BINDERS	6.70 hrs.	770.50
08/21/2009	CJV	REVIEW AND AMEND EXHIBIT BINDERS AND INDEXES	3.10 hrs.	356.50
08/21/2009	CJV	TELEPHONE CALL WITH ATTORNEY NICKLES	0.10 hrs.	11.50
08/23/2009	CRJ	MEET WITH CLIENT TO PREPARE FOR MEDIATION	2.50 hrs.	875.00
08/24/2009	CJV	TELEPHONE CALL WITH ATTORNEY NICKLES	0.10 hrs.	11.50
08/25/2009	CLD	CONFERENCE WITH C. JOHNSTON; REVIEW DEFENDANT'S MOTION IN LIMINE	0.70 hrs.	126.00
08/25/2009	CRJ	MEET WITH MICHELLE LALLY TO REVIEW EXHIBITS AND DISCUSS MEDIATION	3.00 hrs.	1,050.00
08/25/2009	CRJ	MEET WITH CLIENT TO PREPARE FOR MEDIATION	1.00 hrs.	350.00
08/25/2009	CRJ	ATTEND MEDIATION	2.50 hrs.	875.00
08/25/2009	CRJ	REVIEW DEFENDANT'S MOTIONS IN LIMINE	1.50 hrs.	525.00
08/25/2009	CJV	MEET WITH CLIENT TO PREPARE FOR MEDIATION	1.00 hrs.	115.00
08/25/2009	CJV	ATTEND MEDIATION	2.50 hrs.	287.50
08/26/2009	CLD	RESEARCH REGARDING DEFENDANT'S MOTION IN LIMINE RE: STRAY REMARKS/DOUBLE HEARSAY	1.20 hrs.	216.00
08/26/2009	CRJ	MEET WITH CLIENT; ATTEND MEDIATION	3.00 hrs.	1,050.00
08/26/2009	CRJ	ATTEND MEDIATION; MEET WITH CLIENT	3.50 hrs.	1,225.00
08/26/2009	CJV	MEET WITH CLIENT AND ATTEND MEDIATION	3.00 hrs.	345.00
08/27/2009	CLD	RESEARCH REGARDING DEFENDANT'S MOTION IN LIMINE RE: STRAY REMARKS AND DOUBLE HEARSAY	0.40 hrs.	72.00
08/31/2009	NVL	REVIEW FILE FOR EEOC POSITION STATEMENT AND EMAIL SAME TO A. FELDSTEIN.	0.30 hrs.	52.50
08/31/2009	CRJ	MEET WITH C. VRSCAK, A. FELDSTEIN, M. NICKLES TO REVIEW TRIAL EXHIBITS FOR STIPULATION	6.00 hrs.	2,100.00
08/31/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: STATUS	0.30 hrs.	105.00
08/31/2009	CRJ	MEET WITH C. VRSCAK TO DRAFT STIPULATIONS OF EXHIBITS AND FACTS	1.00 hrs.	350.00

08/31/2009	CRJ	MEET WITH C. VRSCAK TO REVIEW TRIAL EXHIBITS	1.00 hrs.	350.00
08/31/2009	CJV	MEETING WITH CRJ TO REVIEW TRIAL EXHIBITS	1.00 hrs.	115.00
08/31/2009	CJV	MEET WITH CRJ TO DRAFT STIPULATIONS OF EXHIBITS AND FACTS	1.00 hrs.	115.00
08/31/2009	CJV	MEET WITH CRJ, ATTORNEY FELDSTEIN AND ATTORNEY NICKLES TO REVIEW TRIAL EXHIBITS FOR STIPULATION	6.00 hrs.	690.00
09/01/2009	CLD	RESEARCH REGARDING DOUBLE HEARSAY MOTION IN LIMINE; DRAFT RESPONSE TO MOTION IN LIMINE	2.30 hrs.	414.00
09/01/2009	NVL	REVIEW DEFENDANT'S MOTION IN LIMINE AND BRIEF RE EXCLUDING CENSUS INFORMATION.	0.40 hrs.	70.00
09/01/2009	NVL	DRAFT RESPONSE TO MOTION IN LIMINE RE CENSUS AT NATRONA.	0.50 hrs.	87.50
09/01/2009	NVL	REVIEW DEPO TRANSCRIPTS RE CENSUS AT NATRONA HEIGHTS FOR RESPONSE TO MOTION IN LIMINE RE SAME.	1.00 hrs.	175.00
09/01/2009	CRJ	DRAFT RESPONSE TO MOTIONS IN LIMINE AND JOINT JURY INSTRUCTIONS	5.50 hrs.	1,925.00
09/01/2009	CRJ	MEET WITH C. VRSCAK TO REVIEW TRIAL EXHIBITS AND PREPARE STIPULATION	2.80 hrs.	980.00
09/01/2009	CJV	WORK ON RECONFIGURED PLAINTIFF AND JOINT TRIAL DESIGNATIONS	5.30 hrs.	609.50
09/01/2009	CJV	MEET WITH CRJ TO REVIEW TRIAL EXHIBITS AND PREPARE STIPULATION	2.80 hrs.	322.00
09/02/2009	CLD	DRAFT MOTION IN LIMINE RESPONSE; RESEARCH REGARDING SAME; CONFERENCE WITH C. JOHNSTON REGARDING SAME	4.80 hrs.	864.00
09/02/2009	NVL	RESEARCH CASE LAW FOR AND DRAFT RESPONSE TO MOTION IN LIMINE RE RECENT CENSUS AT NATRONA.	3.00 hrs.	525.00
09/02/2009	NVL	RESEARCH FOR AND DRAFT RESPONSE TO MOTION IN LIMINE RE GOSSIP RE OTHER MALE DOCS.	2.00 hrs.	350.00
09/02/2009	NVL	RESEARCH RULES OF EVIDENCE AND CASE LAW RE ADMISSIBILITY OF BIAS OF WITNESS.	1.50 hrs.	262.50
09/02/2009	NVL	REVIEW AND REVISE JOINT PROPOSED VERDICT SLIP.	1.50 hrs.	262.50
09/02/2009	NVL	REVIEW DEPO TESTIMONY OF T.	0.50 hrs.	87.50

ZANANDREA FOR RESPONSE TO
MOTION IN LIMINE RE "OLD BOYS
CLUB" TESTIMONY.

09/02/2009	NVL	REVIEW DEPO TRANSCRIPTS FOR REFERENCES TO D3 INVOLVEMENT FOR RESPONSE TO MOTION IN LIMINE.	0.50 hrs.	87.50
09/02/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: STATUS	0.20 hrs.	70.00
09/02/2009	CRJ	MEET WITH J. CARROLL RE: FAILURE TO HIRE JURY INSTRUCTION AND MOTION IN LIMINE RE: D3 RELATIONSHIP	0.50 hrs.	175.00
09/02/2009	CRJ	DRAFT RESPONSES TO MOTIONS IN LIMINE; EXHIBIT STIPULATION; JOINT JURY INSTRUCTIONS	10.50 hrs.	3,675.00
09/02/2009	CRJ	MEET WITH C. VRSCAK TO REVIEW TRIAL EXHIBITS AND DRAFT STIPULATION OF EXHIBITS	1.00 hrs.	350.00
09/02/2009	CJV	MEET WITH CRJ TO REVIEW TRIAL EXHIBITS AND DRAFT STIPULATION OF EXHIBITS	1.00 hrs.	115.00
09/02/2009	CJV	PROOF RESPONSE TO DEFENDANT'S MOTION IN LIMINE - QUADAR	0.30 hrs.	34.50
09/02/2009	CJV	WORK ON RECONFIGURED PLAINTIFF AND JOINT EXHIBIT DESIGNATIONS	9.00 hrs.	1,035.00
09/03/2009	CLD	DRAFT MOTION IN LIMINE RESPONSE	4.60 hrs.	828.00
09/03/2009	NVL	REVIEW AND REVISE RESPONSES TO MOTIONS IN LIMINE AND PULL EXHIBITS FOR SAME.	3.00 hrs.	525.00
09/03/2009	NVL	MEET WITH CV TO REVIEW AND FINALIZE PLAINTIFF'S EXHIBIT LIST WITH DEFENDANT'S OBJECTIONS.	2.00 hrs.	350.00
09/03/2009	NVL	REVIEW AND REVISE STIPULATION OF FACTS.	0.50 hrs.	87.50
09/03/2009	NVL	REVISE PROPOSED JOINT VERDICT SLIP.	1.00 hrs.	175.00
09/03/2009	NVL	DRAFT PLAINTIFF'S PROPOSED VOIRE DIRE.	2.00 hrs.	350.00
09/03/2009	CRJ	DRAFT AND REVISE JURY INSTRUCTIONS, IN LIMINE RESPONSES, VOIR DIRE, EXHIBIT AND FACT STIPULATIONS	11.40 hrs.	3,990.00
09/03/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Response to Motion	0.20 hrs.	70.00
09/03/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER	0.20 hrs.	70.00

09/03/2009	CRJ	INSTITUTE Response to Motion RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Response to Motion	0.20 hrs.	70.00
09/03/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Response to Motion	0.20 hrs.	70.00
09/03/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Response to Motion	0.20 hrs.	70.00
09/03/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Response to Motion	0.20 hrs.	70.00
09/03/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Exhibit List	0.20 hrs.	70.00
09/03/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Proposed Voir Dire	0.20 hrs.	70.00
09/03/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Proposed Jury Instructions	0.20 hrs.	70.00
09/03/2009	CJV	REVIEW EXHIBIT LISTS; PROOF AND ASSEMBLE RESPONSES TO DEFENDANT'S VARIOUS MOTIONS IN LIMINE	7.20 hrs.	828.00
09/03/2009	CJV	MEET WITH NVL TO REVIEW AND FINALIZE PLAINTIFF'S EXHIBIT LIST WITH DEFENDANT'S OBJECTIONS	2.00 hrs.	230.00
09/08/2009	CRJ	PHONE CONFERNE WITH NICOLE RE: EXHIBIT BINDER PRODUCTION; PHONE CONFERNE WITH M.NICKES RE: SAME	0.20 hrs.	70.00
09/08/2009	CJV	BEGIN PREPARATION OF EXHIBIT BINDERS	6.80 hrs.	782.00
09/09/2009	CRJ	REVIEW DEFENDANT'S RESPONSES TO PLAINTIFF'S MOTIONS IN LIMINE	1.30 hrs.	455.00
09/09/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: STATUS	0.50 hrs.	175.00
09/09/2009	CRJ	PHONE CONFERENCE WITH CLIENTS AND M. LALLY RE: REINSTATEMENT ISSUE	0.60 hrs.	210.00

09/09/2009	CRJ	DRAFT MOTION FOR LEAVE TO FILE AMENDED WITNESS LIST	0.30 hrs.	105.00
09/09/2009	CJV	PROOF UNOPPOSED MOTION FOR LEAVE AND ORDER	0.20 hrs.	23.00
09/09/2009	CJV	CONTINUE WORK ON EXHIBIT BINDERS	5.30 hrs.	609.50
09/10/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order on Motion for Leave to File	0.20 hrs.	70.00
09/10/2009	CJV	CONTINUE WORK ON EXHIBIT BINDERS	5.00 hrs.	575.00
09/11/2009	CJV	CONTINUE WORK ON EXHIBIT BINDERS	6.00 hrs.	690.00
09/13/2009	CRJ	MEET WITH CLIENTS AND M. LALLY TO DISCUSS MEDIATION STRATEGY	2.00 hrs.	700.00
09/13/2009	CRJ	MEET WITH CLIENTS AND M. LALLY TO DISCUSS MEDIATION STRATEGY	2.00 hrs.	700.00
09/14/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Motion to Amend/Correct	0.20 hrs.	70.00
09/15/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order on Motion to Amend/Correct	0.20 hrs.	70.00
09/16/2009	CJV	PREPARE EXHIBIT BINDERS	1.00 hrs.	115.00
09/17/2009	NVL	MEET WITH CRJ TO REVIEW MOTIONS IN LIMINE ORDER AND TRIAL ISSUES.	1.00 hrs.	175.00
09/17/2009	CRJ	MEET WITH N. LYKOS TO REVIEW MOTIONS IN LIMINE ORDER AND TRIAL ISSUES	1.00 hrs.	350.00
09/17/2009	CJV	PREPARE EXHIBIT BINDERS	4.00 hrs.	460.00
09/18/2009	CRJ	MEET WITH CLIENT; ATTEND FINAL PART OF MEDIATION	1.00 hrs.	350.00
09/18/2009	CJV	ATTEND FINAL PART OF MEDIATION	1.00 hrs.	115.00
09/18/2009	CJV	PREPARE EXHIBIT BINDERS	4.80 hrs.	552.00
09/22/2009	CJV	PREPARE EXHIBIT BINDERS	4.90 hrs.	563.50
09/22/2009	CJV	DRAFT LETTER TO JUDGE SCHWAB	0.20 hrs.	23.00
10/15/2009	CJV	PREPARATION OF TRIAL EXHIBITS	1.70 hrs.	195.50
10/16/2009	CJV	PREPARE EXHIBIT BINDERS	3.20 hrs.	368.00
10/21/2009	CJV	LETTER TO COUNSEL	0.20 hrs.	23.00
10/21/2009	CJV	TELEPHONE CALL WITH ATTORNEY NICKLES	0.10 hrs.	11.50
10/23/2009	CRJ	MEET WITH C. VRSCAK TO REVIEW TRIAL EXHIBIT OBJECTIONS IN PREPARATION FOR STATUS CONFERENCE	3.00 hrs.	1,050.00
10/23/2009	CRJ	MEET WITH C. VRSCAK TO REVIEW	3.00 hrs.	1,050.00

		TRIAL EXHIBIT OBJECTIONS IN PREPARATION FOR STATUS CONFERENCE		
10/23/2009	CJV	MEET WITH CRJ TO REVIEW TRIAL EXHIBIT OBJECTIONS IN PREPARATION FOR STATUS CONFERENCE	3.00 hrs.	345.00
10/28/2009	NVL	MEET WITH CRJ AND CV TO DISCUSS VARIOUS TRIAL EXHIBITS; CONFERENCE CALL WITH M. NICKLES RE SAME.	1.50 hrs.	262.50
10/28/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF K. GERSZTEN	1.00 hrs.	350.00
10/28/2009	CRJ	MEET WITH N. LYKOS & C. VRSCAK TO REVIEW TRIAL EXHIBITS; PHONE CONFERENCE WITH M. NICKLES RE: SAME	1.50 hrs.	525.00
10/28/2009	CJV	MEET WITH CRJ AND NVL TO REVIEW AND DISCUSS TRIAL EXHIBITS; TELEPHONE CALL WITH ATTORNEY NICKLES RE: SAME	1.50 hrs.	172.50
10/30/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF K. GERSZTEN	1.00 hrs.	350.00
10/30/2009	CJV	REVIEW DOCUMENTS	3.00 hrs.	345.00
11/02/2009	NVL	READ PLAINTIFF'S DEPOSITION TRANSCRIPT.	0.50 hrs.	87.50
11/02/2009	NVL	REVIEW DEFENDANT'S PROPOSED AMENDMENT TO JURY INSTRUCTIONS AND DISCUSS SAME WITH CRJ.	0.40 hrs.	70.00
11/02/2009	CRJ	REVIEW TRIAL EXHIBITS; PHONE CONFERENCE WITH COUNSEL RE: EFFECT OF MOTION IN LIMINE ORDERS ON EXHIBI	3.00 hrs.	1,050.00
11/02/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Motion for Miscellaneous Relief	0.20 hrs.	70.00
11/02/2009	CRJ	RECEIVE AND REVISE DEFENDANT'S SUPPLEMENTAL JURY INSTRUCTION; DISCUSS WITH N. LYKOS	0.40 hrs.	140.00
11/02/2009	CJV	TELEPHONE CALL WITH CRJ TO ATTORNEY NICKLES; REDACT CERTAIN TRIAL EXHIBITS	5.80 hrs.	667.00
11/03/2009	CLD	TELEPHONE CALL WITH C. JOHNSTON; RESEARCH AND DRAFT EMAIL REGARDING AVAILABLE REMEDIES	0.30 hrs.	54.00
11/03/2009	NVL	MEET WITH CRJ TO DISCUSS RESEARCH RE PRESENTATION OF BACK PAY EVIDENCE TO JURY, JURY	1.50 hrs.	262.50

		INSTRUCTIONS.		
11/03/2009	NVL	PHONE CONFERENCE WITH CLIENT RE DEPOSITION OF M. ROSENSTEIN AND JURY INSTRUCTIONS.	0.40 hrs.	70.00
11/03/2009	CRJ	MEET WITH N. LYKOS TO DISCUSS RESEARCH RE: PRESENTATION OF BACK PAY EVIDENCE TO JURY, JURY INSTRUCTI	1.50 hrs.	525.00
11/03/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: DEPOSITION OF M. ROSENSTEIN, JURY INSTRUCTIONS	0.40 hrs.	140.00
11/03/2009	CRJ	REVIEW COURT'S FINAL JURY INSTRUCTIONS	0.50 hrs.	175.00
11/03/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Proposed Jury Instructions	0.20 hrs.	70.00
11/03/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order	0.20 hrs.	70.00
11/03/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order on Motion for Miscellaneous Relief	0.20 hrs.	70.00
11/03/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order	0.20 hrs.	70.00
11/03/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF K. GERSZTEN	1.00 hrs.	350.00
11/03/2009	CJV	REVIEW/SCAN EXHIBITS	2.00 hrs.	230.00
11/04/2009	NVL	WATCH ELLIS AND GREENBERGER DEPOSITIONS TO DETERMINE IF THEY CAN BE USED IN LIEU OF LIVE TESTIMONY.	3.50 hrs.	612.50
11/04/2009	NVL	ATTEND PRELIMINARY PRETRIAL CONFERENCE; MEET WITH CRJ AND CV TO DISCUSS TRIAL STRATEGY.	1.50 hrs.	262.50
11/04/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order	0.20 hrs.	70.00
11/04/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF M. ROSENSTEIN AND PREPARE QUESTIONS FOR CROSS EXAMINATION	5.50 hrs.	1,925.00
11/04/2009	CRJ	RECEIVE AND REVIEW Activity in Case	0.20 hrs.	70.00

Date	Case	Activity	Hours	Amount
	2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE	Order		
11/04/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Terminate Hearings	0.20 hrs.	70.00
11/04/2009	CRJ	ATTEND PRETRIAL CONFERENCE; MEET WITH N. LYKOS, C. VRSCAK RE: TRIAL STRATEGY	1.50 hrs.	525.00
11/04/2009	CRJ	REVIEW VERDICT FORM	0.40 hrs.	140.00
11/04/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Pretrial Conference - Initial	0.20 hrs.	70.00
11/04/2009	CJV	REVIEW/SCAN EXHIBITS	5.00 hrs.	575.00
11/04/2009	CJV	TELEPHONE CALL WITH JOHN GUSDONEVICH	0.10 hrs.	11.50
11/04/2009	CJV	MEET WITH CRJ AND NVL TO DISCUSS TRIAL STRATEGY	0.50 hrs.	57.50
11/05/2009	CRJ	PHONE CONFERENCE WITH DEFENSE COUNSEL RE: VARIOUS TRIAL ISSUES	0.30 hrs.	105.00
11/05/2009	CRJ	REVIEW DEPOSITION TRANSCRIPTS TO PREPARE QUESTIONS FOR AS FOR CROSS EXAMINATION	3.00 hrs.	1,050.00
11/05/2009	CRJ	PHONE CONFERENCE WITH A. FELDSTEIN RE: JOINT MOTION TO REQUEST ADDITIONAL TRIAL TIME	0.40 hrs.	140.00
11/05/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF K. GERSZTEN	2.70 hrs.	945.00
11/05/2009	CJV	TELEPHONE CALL WITH JOHN GUSDONEVICH	0.10 hrs.	11.50
11/05/2009	CJV	REVIEW/SCAN EXHIBITS	5.80 hrs.	667.00
11/06/2009	NVL	REVIEW TRIAL EXHIBITS FOR TRIAL DEPOSITION OF M. ROSENSTEIN.	0.50 hrs.	87.50
11/06/2009	NVL	TRAVEL TO LEXINGTON, KY FOR ROSENSTEIN TRIAL DEPO; DISCUSS TRIAL STRATEGY WITH CLIENT AND CRJ.	8.50 hrs.	1,487.50
11/06/2009	CRJ	TRAVEL TO LEXINGTON, KY FOR ROSENSTEIN TRIAL DEPO; DISCUSS TRIAL STRATEGY WITH CLIENT, N. LYKOS	8.50 hrs.	2,975.00
11/06/2009	CRJ	MEET WITH C. VRSCAK TO REVIEW TRIAL EXHIBITS; REVIEW DEPO TRANSCRIPT OF K. GERSZTEN	2.50 hrs.	875.00
11/06/2009	CJV	REVIEW/SCAN EXHIBITS	4.50 hrs.	517.50
11/07/2009	NVL	ATTEND TRIAL DEPOSITION OF M.	2.50 hrs.	437.50

		ROSENSTEIN.		
11/07/2009	NVL	TRAVEL FROM LEXINGTON, KY AFTER ROSENSTEIN TRIAL DEPO; DISCUSS TRIAL STRATEGY WITH CLIENT AND CRJ.	7.00 hrs.	1,225.00
11/07/2009	CRJ	ATTEND TRIAL DEPOSITION OF M. ROSENSTEIN	2.50 hrs.	875.00
11/07/2009	CRJ	TRAVEL FROM LEXINGTON, KY AFTER ROSENSTEIN TRIAL DEPO; DISCUSS TRIAL STRATEGY WITH CLIENT, N. LYKOS	7.00 hrs.	2,450.00
11/08/2009	NVL	READ DEPOSITION TRANSCRIPTS IN PREPARATION FOR TRIAL.	2.00 hrs.	350.00
11/08/2009	NVL	REVIEW PLAINTIFF'S TRIAL EXHIBITS WITH CRJ TO DETERMINE USE AT TRIAL.	1.50 hrs.	262.50
11/08/2009	CRJ	REVIEW TRIAL DEPOSITION TRANSCRIPT OF ROSENSTEIN; OUTLINE OBJECTIONS FOR CT; EMAIL SAME TO COUNSEL	1.00 hrs.	350.00
11/08/2009	CRJ	EXCHANGE EMAIL WITH CLIENT RE: WITNESS INFORMATION	0.20 hrs.	70.00
11/08/2009	CRJ	REVIEW PLAINTIFF'S TRIAL EXHIBITS WITH N. LYKOS TO DETERMINE USE AT TRIAL	1.50 hrs.	525.00
11/08/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF T. ZANANDREA	1.50 hrs.	525.00
11/09/2009	NVL	MEET WITH CRJ TO PREP FOR PT CONF; REVIEW WITNESS LIST, JURY INSTRUCTIONS, EXHIBITS, VERDICT SLIP.	5.50 hrs.	962.50
11/09/2009	NVL	MEET WITH WITNESS AND CRJ TO REVIEW AND PREPARE FOR TRIAL TESTIMONY.	3.00 hrs.	525.00
11/09/2009	CRJ	PHONE CONFERENCE WITH A. FELDSTEIN RE: OBJECTIONS TO TRIAL TESTIMONY OF M. ROSENSTEIN	0.20 hrs.	70.00
11/09/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: WITNESS INFORMATION	0.20 hrs.	70.00
11/09/2009	CRJ	MEET W/ N. LYKOS TO PREPARE FOR PRETRIAL CONF, REVIEW WITNESS LIST, JURY INSTR, EXHIBITS, VERDICT SL	5.50 hrs.	1,925.00
11/09/2009	CRJ	MEET WITH WITNESS TO PREPARE TESTIMONY	3.00 hrs.	1,050.00
11/09/2009	CJV	TRIAL PREPARATION	7.40 hrs.	851.00
11/10/2009	NVL	ATTEND FINAL PRE-TRIAL CONFERENCE.	1.50 hrs.	262.50

11/10/2009	NVL	MEET WITH CRJ AND CV TO DISCUSS PRETRIAL CONFERENCE AND TRIAL STRATEGY.	0.50 hrs.	87.50
11/10/2009	NVL	READ DEPO TRANSCRIPT OF G. ROSS AND REVIEW DVD OF SAME TO SELECT CLIPS FOR USE AT TRIAL.	4.00 hrs.	700.00
11/10/2009	NVL	MEET WITH CRJ TO DISCUSS JURY INSTRUCTIONS AGREEMENT AND EDITING OF ROSENSTEIN DEPO.	1.00 hrs.	175.00
11/10/2009	NVL	MEET WITH CRJ TO DISCUSS AS FOR CROSS TESTIMONY OF G. ROSS AND J. PIEMME.	2.00 hrs.	350.00
11/10/2009	NVL	READ DEPO TRANSCRIPT OF J. PIEMME AND REVIEW DVD OF SAME TO SELECT CLIPS FOR USE AT TRIAL.	3.00 hrs.	525.00
11/10/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Pretrial Conference - Final	0.20 hrs.	70.00
11/10/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Motion to Amend/Correct	0.20 hrs.	70.00
11/10/2009	CRJ	ATTEND FINAL PRETRIAL CONFERENCE	1.50 hrs.	525.00
11/10/2009	CRJ	MEET WITH N. LYKOS, C. VRSCAK TO DISCUSS PRETRIAL CONFERENCE ISSUES	0.50 hrs.	175.00
11/10/2009	CRJ	MEET WITH N. LYKOS RE: JURY INSTRUCTIONS, ROSENSTEIN EDITS, AUDIO TAPE EDITS, TESTMNY OF ROSS, PIEMM	3.00 hrs.	1,050.00
11/10/2009	CRJ	REVIEW DEPOSITION TRANSCRIPTS AND PREPARE AS FOR CROSS EXAMINATION QUESTIONS	5.50 hrs.	1,925.00
11/10/2009	CJV	TRIAL PREPARATION	8.80 hrs.	1,012.00
11/11/2009	NVL	MEET WITH CRJ RE: DEFENDANT'S MOTION IN LIMINE RE DR. HILL, REVIEW CASE LAW AND DRAFT RESPONSE.	5.50 hrs.	962.50
11/11/2009	NVL	REVIEW D. HERON DEPO TRANSCRIPT AND DVD TO SELECT PORTIONS OF VIDEO FOR USE AT TRIAL.	2.00 hrs.	350.00
11/11/2009	NVL	REVIEW TESTIMONY AND MAP OF CANCER CENTERS NETWORK; CREATE DEMONSTRATIVE EXHIBIT RE NON-COMPETE.	1.00 hrs.	175.00
11/11/2009	NVL	UPDATE DAMAGES CALCULATIONS; REVIEW JONES AND SMITH CONTRACTS	2.50 hrs.	437.50

		RE INCENTIVES; PREPARE DAMAGES EXHIBITS		
11/11/2009	CRJ	MEET WITH N. LYKOS RE DEF'S MOTION IN LIMINE RE: DR. HILL, REVIEW CASELAW, DRAFT RESPONSE	5.50 hrs.	1,925.00
11/11/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF D. HERON AND DRAFT AS FOR CROSS QUESTIONS	5.50 hrs.	1,925.00
11/11/2009	CRJ	PHONE CONFERNCE WITH CLIENT RE:PRETRIAL MATTERS	0.30 hrs.	105.00
11/11/2009	CJV	TRIAL PREPARATION	8.60 hrs.	989.00
11/12/2009	NVL	MEET WITH CRJ TO REVIEW TRIAL EXHIBITS BY WITNESS.	3.00 hrs.	525.00
11/12/2009	NVL	READ DEPOSITION TRANSCRIPT OF BETH WILD SHIRING.	3.00 hrs.	525.00
11/12/2009	NVL	MEET WITH CRJ TO REVIEW DEFENDANT'S RESPONSE TO MOTION TO SEQUESTER; DRAFT REPLY.	1.00 hrs.	175.00
11/12/2009	NVL	REVIEW AND FILE PLAINTIFF'S OBJECTION TO FINAL JURY INSTRUCTIONS.	0.50 hrs.	87.50
11/12/2009	NVL	MEET WITH CLIENT AND CRJ TO PREPARE FOR TRIAL TESTIMONY.	4.30 hrs.	752.50
11/12/2009	NVL	IMPORT TRIAL EXHIBITS AND VIDEO CLIPS INTO TRIAL DIRECTOR, REVIEW EXHIBITS AND VIDEO CLIPS.	2.00 hrs.	350.00
11/12/2009	CRJ	MEET WITH N. LYKOS TO REVIEW TRIAL EXHIBITS ACCORDING TO WITNESS	3.00 hrs.	1,050.00
11/12/2009	CRJ	MEET WITH CLIENT AND N. LYKOS TO PREPARE FOR CLIENT'S TRIAL TESTIMONY	4.30 hrs.	1,505.00
11/12/2009	CRJ	PHONE CONFERENCES WITH DEFENSE COUNSEL RE: COURT ORDER EXCLUDING DR. HILL EVIDENCE	0.30 hrs.	105.00
11/12/2009	CRJ	DRAFT AS FOR CROSS EXAMINATION QUESTIONS FOR D. HERON	2.00 hrs.	700.00
11/12/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order	0.20 hrs.	70.00
11/12/2009	CRJ	MEET WITH N. LYKOS TO REVIEW DEFENDANT'S RESPONSE TO MOTION TO SEQUESTER DRAFT REPLY	1.00 hrs.	350.00
11/12/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Response/Briefing Schedule	0.20 hrs.	70.00

11/12/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order on Motion for Clarification	0.20 hrs.	70.00
11/12/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order on Motion in Limine	0.20 hrs.	70.00
11/12/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Order	0.20 hrs.	70.00
11/12/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF J. SCARANO	2.70 hrs.	945.00
11/12/2009	CJV	TRIAL PREPARATION	9.20 hrs.	1,058.00
11/13/2009	NVL	REVIEW G. ROSS DEPOSITION; DICTATE OUTLINE FOR CROSS EXAMINATION OF G. ROSS.	1.50 hrs.	262.50
11/13/2009	NVL	REVIEW B. WILD DEPOSITION; DICTATE OUTLINE FOR CROSS EXAMINATION OF B. WILD; REVISE OUTLINE.	2.50 hrs.	437.50
11/13/2009	NVL	MEET WITH CLIENT AND CRJ TO PREPARE FOR TRIAL TESTIMONY.	8.00 hrs.	1,400.00
11/13/2009	CRJ	PHONE CONFERENCE WITH P. GERSZTEN RE: LOGISTICS FOR TRIAL	0.20 hrs.	70.00
11/13/2009	CRJ	MEET WITH CLIENT, N. LYKOS, M. LALLY TO PREPARE CLIENT FOR TRIAL TESTIMONY	8.00 hrs.	2,800.00
11/13/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF J. SCARANO AND DRAFT AS FOR CROSS EXAMINATION	5.00 hrs.	1,750.00
11/13/2009	CJV	TRIAL PREPARATION	6.90 hrs.	793.50
11/14/2009	NVL	TRIAL PREPARATION WITH CRJ AND CV RE AS FOR CROSS TESTIMONY AND TRIAL EXHIBIT USE.	9.00 hrs.	1,575.00
11/14/2009	CRJ	TRIAL PREPARATION WITH N. LYKOS, C. VRSCAK RE: AS FOR CROSS TESTIMONY, TRIAL EXHIBIT USE	9.00 hrs.	3,150.00
11/14/2009	CRJ	DRAFT AS FOR CROSS EXAMINATION QUESTIONS FOR J. SCARANO	2.00 hrs.	700.00
11/14/2009	CJV	TRIAL PREPARATION	5.50 hrs.	632.50
11/15/2009	NVL	MEET WITH CRJ TO DRAFT OPENING; FINALIZE AS FOR CROSS-EX QUESTIONS; REVIEW EXHIBITS AND TRIAL BINDER	8.50 hrs.	1,487.50
11/15/2009	NVL	MEET WITH CLIENT AND CRJ TO PREPARE FOR TRIAL TESTIMONY AND REVIEW TRIAL EXHIBITS WITH CLIENT.	2.00 hrs.	350.00

11/15/2009	NVL	REVISE BACK PAY CHART RE COVERAGE PHYSICIAN POSITION.	0.30 hrs.	52.50
11/15/2009	CRJ	MEET WITH N. LYKOS TO DRAFT OPENING, FINALIZE AS FOR CROSS EX QS; REVIEW TRIAL EXHIBITS & TRIAL BIND	8.50 hrs.	2,975.00
11/15/2009	CRJ	PREPARE CLIENT FOR TESTIMONY AND REVIEW TRIAL EXHIBITS WITH CLIENT	2.00 hrs.	700.00
11/15/2009	CJV	TRIAL PREPARATION	9.00 hrs.	1,035.00
11/16/2009	NVL	MEET WITH CLIENT AND ATTEND TRIAL: DAY 1.	7.00 hrs.	1,225.00
11/16/2009	NVL	MEET WITH CLIENT AND TRIAL TEAM TO DISCUSS STRATEGY FOR DAY 2 OF TRIAL.	2.00 hrs.	350.00
11/16/2009	NVL	PREPARE FOR TRIAL - DAY 2; REVISE AS FOR CROSS EXAMINATION QUESTIONS; REVIEW M. ROSENSTEIN DVD.	5.50 hrs.	962.50
11/16/2009	CRJ	MEET WITH CLIENT AND ATTEND TRIAL - DAY ONE	7.00 hrs.	2,450.00
11/16/2009	CRJ	MEET WITH CLIENT AND TRIAL TEAM TO DISCUSS STRATEGY FOR DAY TWO	2.00 hrs.	700.00
11/16/2009	CRJ	PREPARE FOR TRIAL - DAY TWO; REVISE AS FOR CROSS EXAMINATION	5.50 hrs.	1,925.00
11/16/2009	CJV	MEET WITH CLIENT AND ATTEND TRIAL - DAY ONE	7.00 hrs.	805.00
11/16/2009	CJV	PREPARE FOR TRIAL - DAY TWO; REVIEW VIDEO TESTIMONY OF M. ROSENSTEIN; PREPARE EXHIBITS	3.30 hrs.	379.50
11/16/2009	CJV	MEET WITH CLIENT AND TRIAL TEAM TO DISCUSS STRATEGY FOR DAY TWO	2.00 hrs.	230.00
11/17/2009	NVL	MEET WITH CLIENT AND TRIAL TEAM TO DISCUSS TRIAL STRATEGY.	1.50 hrs.	262.50
11/17/2009	NVL	MEET WITH N. LYKOS TO DISCUSS EXAMINATION OF DEFENDANT WITNESSES; PHONE CONFERENCE WITH T. ZANANDREA	2.50 hrs.	437.50
11/17/2009	CRJ	MEET WITH CLIENT AND ATTEND TRIAL - DAY TWO	8.00 hrs.	2,800.00
11/17/2009	CRJ	MEET WITH CLIENT AND TRIAL TEAM TO DISCUSS TRIAL STRATEGY	1.50 hrs.	525.00
11/17/2009	CRJ	MEET WITH N. LYKOS TO DISCUSS EXAMINATION OF DEFENDANT WITNESSES; PHONE CONFERENCE WITH T. ZANANDREA	2.50 hrs.	875.00
11/17/2009	CRJ	REVIEW DEPOSITION TRANSCRIPT OF T. ZANANDREA AND DRAFT QUESTIONS FOR DIRECT TESTIMONY	1.00 hrs.	350.00
11/17/2009	CJV	PREPARE FOR TRIAL - DAY THREE;	3.20 hrs.	368.00

		PREPARE EXHIBITS		
11/17/2009	CJV	MEET WITH CLIENT AND TRIAL TEAM TO DISCUSS TRIAL STRATEGY	1.50 hrs.	172.50
11/17/2009	CJV	MEET WITH CLIENT AND ATTEND TRIAL - DAY TWO	8.00 hrs.	920.00
11/18/2009	NVL	MEET WITH CILENT AND TRIAL TEAM TO DISCUSS TRIAL STRATEGY.	1.50 hrs.	262.50
11/18/2009	NVL	PREPARE AS FOR CROSS TESTIMONY AND DAMAGES EXHIBITS FOR C. BAGOSTA.	6.50 hrs.	1,137.50
11/18/2009	NVL	MEET WITH CLIENT AND ATTEND TRIAL - DAY 3.	8.00 hrs.	1,400.00
11/18/2009	CRJ	MEET WITH TRIAL TEAM TO DISCUSS TRIAL STRATEGY	1.50 hrs.	525.00
11/18/2009	CRJ	MEET WITH N. LYKOS TO REVIEW AND REVISE DAMAGES INFORMATION FOR C. BOGOSTA TESTIMONY	1.00 hrs.	350.00
11/18/2009	CRJ	MEET WITH CLIENT CLIENT AND ATTEND TRIAL - DAY THREE	8.00 hrs.	2,800.00
11/18/2009	CJV	PREPARE FOR TRIAL - DAY FOUR; PREPARE EXHIBITS; REVIEW JOINT AND PLAINTIFF'S EXHIBITS NOT YET INTRODUCED	3.80 hrs.	437.00
11/18/2009	CJV	MEET WITH CLIENT AND TRIAL TEAM TO DISCUSS STRATEGY FOR DAY FOUR	1.50 hrs.	172.50
11/18/2009	CJV	MEET WITH CLIENT AND ATTEND TRIAL - DAY THREE	8.00 hrs.	920.00
11/19/2009	NVL	MEET WITH TRIAL TEAM TO DISCUSS STRATEGY AND CLOSING ARGUMENT.	2.00 hrs.	350.00
11/19/2009	NVL	MEET WITH CLIENT AND TRIAL TEAM TO DISCUSS EVENTS AT TRIAL AND TRIAL STRATEGY.	2.00 hrs.	350.00
11/19/2009	CRJ	MEET WITH CLIENT AND ATTEND TRIAL	8.00 hrs.	2,800.00
11/19/2009	CRJ	MEET WITH TRIAL TEAM TO DISCUSS STRAGEGY AND CLOSING ARGUMENT	2.00 hrs.	700.00
11/19/2009	CRJ	MEET WITH CLIENT AND TRIAL TEAM TO DISCUSS EVENTS AT TRIAL AND TRIAL STRATEGY	2.00 hrs.	700.00
11/19/2009	CJV	MEET WITH CLIENT AND ATTEND TRIAL - DAY FOUR	8.50 hrs.	977.50
11/19/2009	CJV	MEET WITH CLIENT AND TRIAL TEAM TO DISCUSS EVENTS AT TRIAL AND TRIAL STRATEGY	2.00 hrs.	230.00
11/20/2009	NVL	MEET WITH CRJ TO DISCUSS CLOSING ARGUMENT.	2.00 hrs.	350.00
11/20/2009	CRJ	MEET WITH N. LYKOS TO DISCUSS CLOSING ARGUMENTS	2.00 hrs.	700.00

11/20/2009	CRJ	PHONE CONFERENCE WITH CLIENT RE: TRIAL MATTERS	0.50 hrs.	175.00
11/21/2009	NVL	MEET WITH CRJ TO DISCUSS TRIAL STRATEGY AND PREPARE CLOSING ARGUMENT.	7.00 hrs.	1,225.00
11/21/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Transcript	0.20 hrs.	70.00
11/21/2009	CRJ	MEET WITH N. LYKOS TO DISCUSS TRIAL STRATEGY AND PREPARE CLOSING ARGUMENTS	7.00 hrs.	2,450.00
11/22/2009	CRJ	PHONE CONFERENCE WITH CLIENTS RE: TRIAL MATTERS	0.40 hrs.	140.00
11/23/2009	NVL	PREPARE POWERPOINT PRESENTATION FOR CLOSING ARGUMENT; PREPARE CLOSING ARGUMENT WITH CRJ.	6.50 hrs.	1,137.50
11/23/2009	NVL	DRAFT AND FILE PLAINTIFF'S PROPOSED VERDICT SLIP WITH REVISIONS RE POSITION TITLES.	0.40 hrs.	70.00
11/23/2009	NVL	MEET WITH CLIENT AND ATTEND TRIAL - DAY 5.	7.50 hrs.	1,312.50
11/23/2009	CRJ	MEET WITH CLIENT AND ATTEND TRIAL	7.50 hrs.	2,625.00
11/23/2009	CRJ	WORK ON CLOSING ARGUMENT WITH N. LYKOS	6.50 hrs.	2,275.00
11/23/2009	CJV	MEET WITH CLIENT AND ATTEND TRIAL	7.50 hrs.	862.50
11/23/2009	CJV	PREPARE EXHIBITS FOR COURT; REVIEW EXHIBIT LIST MAINTAINED BY COURT, MAKE CORRECTIONS/ADDITIONS TO SAME	3.80 hrs.	437.00
11/24/2009	NVL	ATTEND ORAL ARGUMENT AND TRIAL; MEET WITH CLIENT WHILE WAITING FOR VERDICT	7.00 hrs.	1,225.00
11/24/2009	CRJ	ATTEND ORAL ARGUMENT AND TRIAL; MEET WITH CLIENT WHILE WAITING FOR VERDICT.	7.00 hrs.	2,450.00
11/24/2009	CJV	ATTEND ORAL ARGUMENT AND TRIAL; MEET WITH CLIENT WHILE WAITING FOR VERDICT	7.00 hrs.	805.00
11/25/2009	NVL	WAIT FOR VERDICT; RECEIVE VERDICT; SPEAK WITH JURY; MEET WITH CLIENTS AND TRIAL TEAM	7.00 hrs.	1,225.00
11/25/2009	CRJ	WAIT FOR VERDICT; RECEIVE VERDICT; SPEAK WITH JURY; MEET WITH CLIENTS AND TRIAL TEAM	4.00 hrs.	1,400.00
11/25/2009	CJV	WAIT FOR VERDICT; RECEIVE VERDICT;	7.00 hrs.	805.00

Date	Party	Description	Hours	Amount
		SPEAK WITH JURY; MEET WITH CLIENTS AND TRIAL TEAM		
11/30/2009	NVL	CALL CLIENT RE STATUS CONFERENCE WITH COURT.	0.20 hrs.	35.00
12/01/2009	NVL	ATTEND STATUS CONFERENCE WITH COURT; DISCUSS SETTLEMENT OPTIONS WITH CILENT.	3.00 hrs.	525.00
12/01/2009	NVL	RESEARCH RE REDUCING FRONT PAY TO PRESENT VALUE; CALCULATE NPV OF FRONT PAY AWARD FOR 20 YEARS.	1.50 hrs.	262.50
12/01/2009	CRJ	ATTEND HEARING TO MOLD VERDICT; MEET WITH CLIENT	3.00 hrs.	1,050.00
12/01/2009	CRJ	MEET WITH M. LALLY TO DISCUSS HEARING AND SETTLEMENT ISSUES	1.00 hrs.	350.00
12/01/2009	CRJ	RECEIVE AND REVIEW Activity in Case 2:08-cv-01280-AJS GERSZTEN v. UNIVERSITY OF PITTSBURGH CANCER INSTITUTE Hearing In Aid Of Judgment	0.20 hrs.	70.00
12/02/2009	NVL	MEET WITH CRJ TO REVIEW ATTORNEY BILL AND FRONT PAY SCHEDULE; PHONE CONFERENCE WITH CLIENT.	3.50 hrs.	612.50
12/02/2009	NVL	RESEARCH INTEREST RATES FOR DISCOUNTING FRONT PAY.	0.50 hrs.	87.50
12/02/2009	CRJ	MEET WITH N. LYKOS TO REVIEW ATTORNEY BILL AND FRONT PAY SCHEDULE; PHONE CONFERENCE WITH CLIENT	3.50 hrs.	1,225.00
12/03/2009	NVL	EMAIL OPPOSING COUNSEL RE FRONT PAY CALCULATION AND ATTORNEY BILL.	0.20 hrs.	35.00
12/03/2009	NVL	CALL ATTORNEYS RE AFFIDAVITS FOR FEE PETITION.	0.40 hrs.	70.00
12/03/2009	NVL	DRAFT MOTION FOR ATTORNEYS FEES AND EXPENSES AND AFFIDAVITS FOR SAME.	2.50 hrs.	437.50
12/03/2009	NVL	CALL FROM OPPOSING COUNSEL RE MEDIATION, FRONT PAY CALCULATION AND ATTORNEYS FEES.	0.20 hrs.	35.00
12/03/2009	CRJ	REVIEW BILLING RECORDS FOR FEE PETITION; PHONE CONFERENCES WITH COUNSEL TO SIGN AFFIDAVITS	1.50 hrs.	525.00
12/04/2009	NVL	CALL J. MILNE RE BOND RATES; CALCULATE PRESENT VALUE OF FRONT PAY; DRAFT PROPOSED FRONT PAY DOC.	2.00 hrs.	350.00
12/04/2009	CRJ	REVIEW AND REVISE ATTORNEY BILL; MOTION FOR FRONT PAY CALCUATION	1.50 hrs.	525.00
12/04/2009	CJV	REVIEW BILLING STATEMENTS IN	3.00 hrs.	345.00

PREPARATION OF FILING MOTION FOR
ATTORNEY'S FEES

\$296,159.00

Billing Summary

JOHNSTON, COLLEEN R.	542.90 hrs.	350.00 /hr	\$190,015.
DAVIS, CAMI L.	16.30 hrs.	180.00 /hr	\$2,934.00
LYKOS, NIKKI V.	302.60 hrs.	175.00 /hr	\$52,955.0
VRSCAK, CHUCK J.	437.00 hrs.	115.00 /hr	\$50,255.0

Total professional services	\$296,159.00
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Total of new charges for this invoice	<u>\$296,159.00</u>
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Total balance now due	<u><u>\$296,159.00</u></u>
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GERSZTEN
v.
UNIVERSITY OF PITTSBURGH CANCER INSTITUTE

Civil Action No. 08-1280

<u>DATE</u>	<u>DESCRIPTION</u>	<u>COST</u>
5-31-2006	Copies	\$2.99
2-15-2007	Parking – Client meeting at Rothman Gordon	\$22.00
2-16-2007	Postage – Certified Letters	\$8.50
3-29-2007	Copies	\$8.28
4-26-2007	Copies	\$7.13
	Postage	\$2.04
9-27-2007	Copies	\$1.38
	Postage	\$0.82
10-31-2007	Copies	\$13.11
	Postage	\$1.23
5-29-2008	Copies	\$4.60
7-31-2008	Copies	\$4.37
	Postage	\$0.59
	Faxes	\$6.00
9-29-2008	Parking – Client meeting at Rothman Gordon	\$12.00
9-30-2008	U.S. District Court Filing Fee	\$350.00
10-30-2008	Copies	\$155.71
	Postage	\$3.62
	Telephone	\$0.66
12-3-2008	Parking – Client meeting at Rothman Gordon	\$16.00
12-8-2008	Parking – Client meeting at Rothman Gordon	\$16.00

<u>DATE</u>	<u>DESCRIPTION</u>	<u>COST</u>
12-31-2008	Messenger Service	\$14.00
	Copies	\$159.39
	Postage	\$0.42
	Faxes	\$176.06
1-31-2009	Outside Legal Fees – Mediation Invoice to Cohen & Grigsby	\$1,225.00
	Copies	\$25.99
	Postage	\$4.88
2-25-2009	Parking – Client meeting at Rothman Gordon	\$16.00
2-28-2009	Messenger Service	\$7.00
	Outside Photocopies	\$25.00
	Copies	\$100.74
	Postage	\$6.77
	Faxes	\$1.50
3-7-2009	LegalVue Video Services – Video Deposition of Dwight Heron, M.D.	\$656.00
3-9-2009	Parking – Client meeting at Rothman Gordon	\$16.00
3-10-2009	Parking – Client meeting at Rothman Gordon	\$16.00
3-17-2009	LegalVue Video Services – Video Deposition of John Piemme	\$354.00
3-17-2009	LegalVue Video Services – Video Deposition of Toni Zanandrea	\$534.00
3-23-2009	LegalVue Video Services – Video Deposition of Jamie Scarano	\$655.00
2-25-2009	Network Deposition Services – Deposition Transcript and Exhibits of Kristina Gerszten	\$588.10
3-24-2009	Robins Court Reporting – Deposition Transcript of Dwight Heron, M.D.	\$964.65
3-24-2009	LegalVue Video Services – Video Deposition of Elizabeth Shiring	\$544.00
3-27-2009	Parking – Client meeting at Rothman Gordon	\$23.00

<u>DATE</u>	<u>DESCRIPTION</u>	<u>COST</u>
3-27-2009	Rebecca A. Miles, Ph.D. – Medical Records	\$75.00
3-31-2009	Copies	\$539.12
	Postage	\$5.47
	Faxes	\$2.25
4-1-2009	Parking – Client meeting at Rothman Gordon	\$16.00
4-1-2009	LegalVue Video Services – Video Deposition of Joel Greenberger, M.D.	\$326.00
4-1-2009	LegalVue Video Services – Video Deposition of Greg Ross	\$456.00
4-1-2009	LegalVue Video Services – Video Deposition of Charles Bogosta	\$284.00
4-1-2009	Robbins Court Reporting – Deposition Transcripts of Toni Zanandrea and John Piemme	\$1,046.35
4-2-2009	Parking – Client meeting at Rothman Gordon	\$14.00
4-2-2009	LegalVue Video Services – Video Deposition of Peter Ellis, M.D.	\$232.00
4-6-2009	Robbins Court Reporting – Deposition Transcript of Charles Bogosta	\$282.30
4-14-2009	Robbins Court Reporting – Deposition Transcripts of Joel Greenberger, M.D., Jamie Scarano and Peter Ellis, M.D.	\$1,350.30
4-21-2009	Robbins Court Reporting – Deposition Transcripts of Elizabeth Shiring and Gregory Ross	\$1,264.65

<u>DATE</u>	<u>DESCRIPTION</u>	<u>COST</u>
7-31-2009	Court Reporter	\$1,408.75
	Messenger Service	\$7.00
	Other	\$66.09
	Overnight Delivery	\$21.57
	Copies	\$207.00
	Postage	\$7.31
	Records Search	\$18.13
	Telephone	\$64.99
8-25-2009	Parking – Client meeting at Rothman Gordon	\$16.00
8-26-2009	Parking – Client meeting at Rothman Gordon	\$16.00
8-27-2009	Messenger Service	\$14.00
	Copies	\$522.10
	Postage	\$0.44
9-18-2009	Parking – Client meeting at Rothman Gordon	\$11.00
9-30-2009	Messenger Service	\$14.00
	Copies	\$769.12
	Postage	\$3.36
	Telephone	\$0.39
10-1-2009	Mediation Invoice to Duane Morris, LP	\$2,351.25
10-16-2009	Parking – Client meeting at Rothman Gordon	\$10.00
10-26-2009	Final Mediation Session Invoice to Duane Morris, LP	\$142.50
10-29-2009	Copies	\$98.44
	Postage	\$3.90
11-2-2009	Hyatt Hotel - Maury Rosenstein's Deposition – Lexington, KY	\$378.13
11-5-2009	Witness Fee – John Piemme	\$43.99
11-5-2009	Witness Fee – Gregory Ross	\$42.94
11-09-2009	Gusdonevich & Associates (Process Server – Subpoenas)	\$230.14

<u>DATE</u>	<u>DESCRIPTION</u>	<u>COST</u>
11-9-2009	An/Dor Reporting and Video Technologies – Court Reporter	\$282.00
11-9-2009	Witness Fee – Toni Zanandrea	\$51.26
11-11-2009	Witness Fee – Elizabeth Ann Wild	\$51.97
11-11-2009	Witness Fee – Jamie Lee Scarano	\$52.82
11-11-2009	Witness Fee – Dwight Heron, M.D.	\$43.69
11-11-2009	Witness Fee – Peter Ellis, M.D.	\$46.00
11-11-2009	Witness Fee – Joel Greenberger, M.D.	\$48.68
11-11-2009	Witness Fee – Edward McGinley, Jr., Esquire	\$40.00
11-13-2009	Parking – Client meeting at Rothman Gordon	\$16.00
11-16-2009	Parking – Client meeting at Rothman Gordon	\$16.00
11-17-2009	Parking – Client meeting at Rothman Gordon	\$16.00
11-18-2009	Parking – Client meeting at Rothman Gordon	\$16.00
11-19-2009	Parking – Client meeting at Rothman Gordon	\$16.00
11-23-2009	Parking – Client meeting at Rothman Gordon	\$16.00
11-24-2009	Parking – Client meeting at Rothman Gordon	\$16.00
11-25-2009	Parking – Client meeting at Rothman Gordon	\$16.00
12-1-2009	Parking – Client meeting at Rothman Gordon	\$16.00
12-7-2009	Copies	\$1,291.91
	Postage	\$8.10
	Telephone	\$0.78
	Faxes	\$7.50
TOTAL COSTS		\$21,181.22